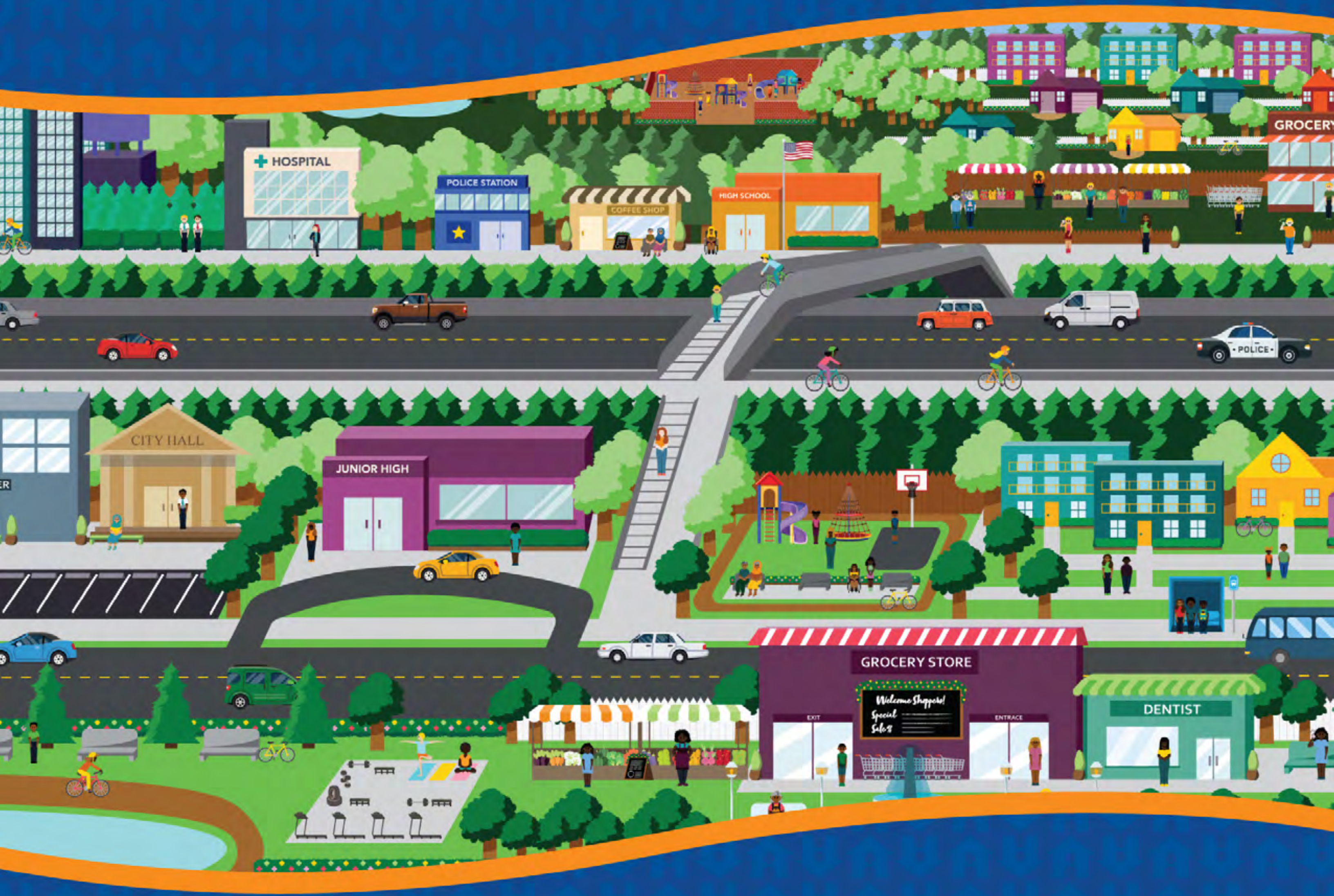
Appendix B
CDBG Toolkit: Strategies for Community Responsiveness



Appendix B
CDBG Toolkit: Strategies for Community Responsiveness

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Prepared for:
CA Department of Housing and Community Development

Prepared as:
An Appendix to the CDBG Grants Management Manual

Prepared by:
EFC

In Partnership with:
ICF
KW Consultants

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FOREWORD

The California Department of Housing and Community Development (HCD)'s mission is to promote safe, affordable homes and vibrant communities for all Californians so that "every California resident can live, work, and play in healthy communities of opportunity." [1]

One of the ways that HCD works towards this mission is by implementing the Community Development Block Grant Program (CDBG), investing federal dollars in local, low-income communities and community members who experience **persistent service gaps**.

The CDBG Toolkit: Strategies for **Community Responsiveness** (CDBG Toolkit, Toolkit) was built in partnership (HCD, EFC, ICF, and KW Consultants), based on engagement with Grantees and HCD staff, to center the priorities, the wisdom, and the right to self- and community-determination of the low-income people and communities most impacted by CDBG programs. At its core, this Toolkit is an offer of loving support and a call to action:

1. *To the public-facing staff members who are working hard to serve their communities and who seek strategies, tools, and/or deeper understanding to authentically do so.*
2. *To the policy makers who are seeking ways to mitigate the impact of harmful policy and prevent harmful unintended consequences, but who may not yet have the information and strategies that they need to do so.*
3. *To the planners and implementers who may not yet understand why they should and/or how to engage in co-design with communities that have experienced persistent service gaps and disinvestment.*
4. *To the communities most impacted, whose priorities, perspectives, and wisdom have rarely been centered in resource allocation.*

Persistent service gaps: Communities require public (and private) services in order for people to live their lives well within them. Services include regular garbage collection; well-paved roads with stop lights, cross-walks, and clear signage; medical clinics and hospitals; safe schools; parks and biking/walking paths; clean tap water; healthy food options within travel distance; functioning and safe public transportation; etc. Not all neighborhoods have these and other services readily available. Neighborhoods (and people) who experience persistent service gaps consistently lack meaningful access to multiple services. This creates significant challenges that get in the way of living lives that are healthy and safe. If a highway separates a neighborhood from doctors and supermarkets, there are inconsistent sidewalks and crosswalks between homes and the neighborhood school, and the pipes in many of the rental homes are rusty, for example, this neighborhood is experiencing persistent service gaps.

Community responsiveness rests on the idea that community members living and working together in a specific place and time may hold a variety of values, priorities, ways of knowing and communicating that create unique micro communities within jurisdictions. These micro communities often have distinct needs and different levels of access to resources to meet their needs. Being community responsive, then, means, proactively listening, trusting people to be experts on themselves, and pivoting to meet the need in ways that feel affirming and dignified to the community being served. This looks like building deep and meaningful relationships with the actual people who make up the community, engaging in co-design with community members, and funding community priorities.

HOW TO USE THIS TOOLKIT

Organizational Structure

This Toolkit is meant to both be a usable resource guide for people who are involved in implementing CDBG and to reveal the connective tissue within the CDBG ecosystem. Part 1, the executive summary, provides an overview of the CDBG ecosystem. Parts 2, 3, 4, and 5 break CDBG into its implementable parts in ways that more closely resemble California HCD's Grants Management Manual (GMM) chapters and the stages of program design and roll-out. These Parts begin with a snapshot that outlines the overarching goals, challenges, strategic approaches, and ways to measure success during the CDBG process. This is then followed by how-to tables, which break each strategic approach down into concrete, implementable steps (supported by examples and reflection questions). Parts 6 & 7 provides deeper context on the community responsive framework used to review the GMM and develop this Toolkit.

Connection to the GMM

The chapters of the Grants Management Manual (GMM) for CDBG include many references to this Toolkit. We tried to address the most pressing concerns within the pages of the GMM itself. Sometimes, that was enough. In other instances, though, it was clear that a broader or more interconnected explanation was paramount. Every issue that could not be sufficiently addressed within the chapters themselves (as well as many that were addressed there) are included in Parts 2-5 in this Toolkit.

- *Part 2 focuses on the components of CDBG that are most closely connected to meaningful public participation: Engagement, marketing, and language access.*
- *Part 3 addresses workforce relations, which includes procurement, hiring practices, and subrecipient selection.*
- *Part 4 looks at program design itself, including both cross-programmatic considerations, such as community responsiveness, relevance, displacement, and documentation-for-eligibility requirements, and also considerations that are specific to each type of programming (housing, economic development, public facilities, and public services).*
- *Part 5 leans into accountability systems, including gathering and analyzing community data, monitoring and evaluation, and complaints and appeals.*

The subsections within each Part are labeled in a way that should make it easy to find what you are looking for. But we have also included GMM references at the end of each subsection.

Relationship to the Regulations

The CDBG Toolkit: Strategies for Community Responsiveness has a multi-faceted relationship to the regulations that govern CDBG. Critically, there are no recommendations within this Toolkit that come into conflict with any of the program-specific or applicable cross-cutting regulations. These strategies simultaneously support Grantees in meeting the regulations and in meaningfully advancing the purpose and values of CDBG (and the National Objectives). For example, you will find strategies and considerations for language access that go beyond statistical significance to account for communities that may not traditionally be considered under such a metric. Similarly, you will find strategies around displacement that address regulatory requirements and the economic impact on families, while also addressing prevention as well as the need to preserve agency, dignity, and connection to community during the displacement process.

City of Grass Valley Memorial Park, Photo Credit: Zac Quentmeyer

PART I: EXECUTIVE SUMMARY

Background

When the Coronavirus pandemic spanned the globe, leading to lockdowns across the United States and indeed the world, the scope of suffering at the individual and community level was enormous. Entire economic sectors, such as retail, shut down, sending unemployment numbers soaring and forcing many businesses to shutter permanently. Others, including schools, went remote, requiring families to juggle work, child-rearing, and homeschooling, and/or to make impossible choices between staying home with young and/or sick children and putting food on the table. Still other sectors, deemed essential, such as supermarkets and hospitals, remained open, putting employees and their families and communities at great risk.[2,3] In 2020 alone, more than 20 million Americans got sick; and more than 360 thousand Americans died.[4]

The CARES Act

Congress responded by passing the Coronavirus Aid, Relief, and Economic Security (CARES) Act in March of 2020, which, among other things, pushed 5 billion dollars in Community Development Block Grants CARES Act (CDBG-CV) to states and other jurisdictions to "prevent, prepare for, and respond to Coronavirus."[5]

COVID-19 impacted everyone, but it did not impact every individual, family, or community in the same ways or to the same extent. As disasters do, COVID shined a light on the persistent service gaps that some individuals and communities were already experiencing, and highlighted the importance of accounting for local context when trying to fill these gaps.[5] This context included the overrepresentation of low-income folks in jobs deemed essential, the overlap of these jobs with lack of paid time off, and higher infection and death rates in these communities.[3,6]

California's Focus on Communities Facing Persistent Service Gaps

In California, this infusion of money came during a time when low-income communities were already being centered at the state level in unprecedented ways. Since 2018, the state has leveraged legislative, administrative, regulatory, and budgetary action to protect and support communities experiencing persistent service gaps. These actions have included tenant protections, affordable housing preservation, thoughtful coordination, housing program design, and evaluation.[7] During this time, the California Department of Housing and Community Development (HCD) created numerous programs to support implementation of policies, programs, and projects to serve communities that have long experienced persistent service gaps.[8] Executive order N-16-22, signed by Governor Newsom in September of 2022, included a number of directives and accountability benchmarks. Amongst these, the order tasked all California agencies with incorporating community engagement and data analysis responsive to these communities into their strategic plans.[9]

The Role of CDBG

President Gerald Ford signed the Housing and Community Development Act of 1974, establishing the CDBG program, in order to streamline the federal government's ability to infuse resources into predominantly poor communities to (1) help them stabilize and thrive, (2) provide safe and decent housing and neighborhoods, and (3) expand access to economic opportunities.

In order to qualify for CDBG funding, a project has to meet one of three National Objectives*, and fall within one category of eligible activities. The three National Objectives are as follows:

1. *Provide benefits to Low- and Moderate-Income persons in one of the following four sub-categories:*
    - *Area-benefit*
    - *Limited Clientele*
    - *Job creation/retention*
    - *Housing*
2. *Aid in the prevention or elimination of blight. Projects meeting this National Objective can do so in one of two ways:*
    - *Area basis (as in a neighborhood)*
    - *Spot basis (as in one building)*
3. *Provide funding for projects that have a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community*

NOTE: Please see GMM Chapter 2 for more information on meeting a National Objective.

Over the years, CDBG has been marked by both successes and opportunities for growth. The funding formula for the annual program itself is an example of the way that CDBG can simultaneously address persistent service gaps while exacerbating others. The United States Department of Housing and Urban Development (HUD) uses four indicators to determine the level of funding granted to a jurisdiction. They are: (1) population growth lag, (2) overcrowded housing conditions, (3) poverty rates, and (4) amount of pre-1940s housing. These are meant to identify areas where both public and private investment in communities is insufficient or nonexistent.[10,11]

In most cases, these indicators have been used successfully to direct funds towards communities in need, however, in some instances they have actually exacerbated persistent service gaps. "In the 1970s, when block grant formulas were written, aging dwellings were considered a proxy for inadequate housing and old infrastructure. Since then, however, some distressed cities have demolished outdated tenements while gentrifying communities renovated old homes or converted empty warehouses into lofts. That dynamic eroded block grant funding for the neediest communities between 1980 and 2000 and in some cases increased funding to their wealthiest peers according to a 2005 HUD study. So, while Detroit bulldozes entire blocks to fight post-recession blight, it's also shedding pre-1940s housing and effectively eroding its funding share, while upscale Newton protects its register of historic homes and gets an edge."[11]

JURISDICTION	CDBG $/PERSON (2017)[11]	MEDIAN FAMILY INCOME (2019)[12]	% PEOPLE LIVING IN POVERTY
Newton, MA	$19.54	$151,068	4%
San Francisco, CA	$19.00	$112,449	10%
Allentown, PA	$17.53	$41,167	26%
Compton, CA	$14.73	$52,883	21%

City of King Pro Youth HEART After School Program, Photo Credit: Steve Adams

PART II: MEANINGFUL PUBLIC PARTICIPATION

Introduction

Why Meaningful Public Participation Matters

CDBG programs are community responsive by design. They exist to invest in the well-being of low-income communities, and the regulations require that community members have a say in how that investment is directed. However, the minimum requirements for public participation do not, on their own, ensure that the people who stand to benefit most from the program will influence its design. Typical participation models tend to bring in community members who have the financial and scheduling flexibility to attend meetings, who speak English fluently, and who are comfortable navigating government processes.

Meaningful public participation goes further than this. It includes the components necessary to ensure that all community members can participate fully and that their input genuinely shapes program design, implementation, and decision-making. These components can include access to transportation, language, partnership with trusted community organizations, etc.[5] When Grantees do this well, they can co-design a program with residents from the start, adjust service delivery based on community feedback, and/or partner with local organizations to reach people who would otherwise be left out. When Grantees fail to do this, they risk designing programs that do not reach (or do not address the concerns of) the people they are intended to serve, deepening the distrust in government that already exists in many communities.

Building Institutional Capacity to Listen Deeply to the Public

Meaningful participation involves more than opening the doors to existing processes. It requires examining the unspoken assumptions built into those processes: including methods of communication that are considered “acceptable” or “meaningful,” and which are dismissed as “unprofessional” or “divisive.” The norms that govern public participation are not neutral. They reflect the values and customs of institutions and can function to exclude people whose ways of communicating, knowing, and being differ from these norms.

An institution committed to community responsiveness will ask itself: Do we only value the perspectives of people who speak in measured tones at a community meeting, or are we also listening to the emotionally charged testimony of displaced residents, the silent solidarity of people wearing matching shirts at a hearing, and the organized voices of people in the streets? Does a resident’s appearance, tone of voice, or body language change how responsive we are to their input? Community members will find ways to communicate their needs. The question rests with whether or not the institution is prepared to listen.

Spotlight: Protecting Public Participation

CDBG requires Grantees to "adopt and enforce a policy prohibiting the use of excessive force by law enforcement agencies within the jurisdiction of the municipality against any individuals engaged in nonviolent civil rights demonstrations" (GMM Chapter 4, Section 4.9).

Grantees can go beyond this baseline by understanding that when they fail to create meaningful, accessible participation processes, community members may turn to alternative methods of communication, including community organizing and protests. Grantees that view these expressions as valid forms of public participation, and that protect the right to free speech with meaningful use-of-force policies prioritizing human safety over property and decorum, will be better positioned to hear and respond to community needs.

It is critical to reflect on which community expressions lead to action, which do not, and why.

Engagement

A Community Responsive Approach to Engagement

CDBG programs are meant to respond to the specific, contextual, expressed needs of the community. Engagement is how Grantees identify those needs, understand which programs feel important, supportive, and viable to the people most affected, and assess whether a program is effective—while making improvements that are responsive to community members being served.

Baseline requirements center on Public Participation Plans. Grantees must (1) inform community members about opportunities to comment, (2) provide accessibility for people with disabilities such as sign language interpretation upon request, (3) hold at least two public hearings at different stages, and (4) publicize meetings meaningfully. Traditionally, publication requirements have been limited to an email blast to stakeholders posted to HCD's website, but additional outreach is encouraged (GMM Chapter 4).

Moving beyond these minimums is essential. Minimum requirements exclude some community members, including folks who don't know where to look for the information. Creating an intentional process that accounts for the experiences and needs of everyone, and ensuring that engagement deeply informs programming, is what transforms a compliance exercise into a community responsive practice.

Spotlight: Partnering to Address Issues Impacting Engagement

"We have [many different] populations in our community. The City is aware that [many people] do not involve themselves in our public process. Upon meeting with different groups, staff became aware that public outreach efforts often did not make it to [certain] populations. The City now has a liaison that attends local... meetings quarterly to provide an update on City projects and answer questions." — 2022 Community Priorities Survey

City of Guadalupe Le Roy Park Community Center, Photo Credit:Dayanira Cruz

A Strategic Approach to Engagement

The strategies below are designed to simultaneously expand who participates and ensure that participation meaningfully shapes programs. Strategies include building genuine relationships with trusted community leaders and organizations, meeting people where they are, and closing the loop so that community input drives real decisions.

The first table below outlines the goal, the challenges, the overall strategic approaches, and the ways to measure success during the community engagement process. This table is followed by three additional tables that take each Strategic Approach and break it down into concrete steps.

A SNAPSHOT: COMMUNITY RESPONSIVE APPROACH TO ENGAGEMENT			
GOAL	Grantees consistently hear from and are responsive to the full range of community members, especially folks most impacted by the programs being designed, so that CDBG investments reflect real community priorities.		
CHALLENGES	**1**	**2**	**3**
	Community members who would benefit most from CDBG programs are not consistently reached by or participating in engagement processes.	Engagement processes do not consistently create conditions where all community members feel safe and empowered to share.	Community input does not consistently and meaningfully shape program design and implementation.
ROOT CAUSES	Outreach methods, timing, locations, and formats do not account for the realities of working families, people with disabilities, or people who speak languages other than English.	Participation norms and formats (such as stringent one directional public comment parameters) often explicitly exclude opportunities for connection and relationship building.	Engagement is often treated as a compliance step rather than as genuine input into decision making, and feedback loops are incomplete or absent.
STRATEGIC APPROACHES	Design outreach and engagement processes that are easy to access, welcoming, and include multiple pathways to participation.	Create engagement spaces that honor multiple ways of knowing (traditional, lived experience), communicating (written, oral, symbolic, individual, collective); that make space for emotion, story telling, and responsiveness; and that account for the real experiences of community members.	Build accountability systems that ensure community input drives program design, and communicate transparently about how input is being used.

MEASUREMENTS OF SUCCESS	Engagement reaches community members who have not participated before, particularly folks who stand to benefit most from CDBG programs.	Community members report feeling safe, heard, and respected in engagement processes, including people who are new to participation.	Program design reflects stated community priorities, and community members can see how their input shaped decisions.

Why it Works

When engagement is treated as a compliance step, the people who show up are usually the people who already knew how to show up. That means the input reflects a narrow slice of the community, and programs get built around that slice, often missing the people they were actually meant to serve. Community responsive engagement changes this. It gives institutions a real picture of what people need, what's getting in the way, and what kinds of solutions they'd actually trust and use. It also changes the relationship over time. Every time an institution follows through on what it heard, and is honest about what it couldn't do and why, it becomes a little easier for community members to show up again. The three-challenge framework in this section is built around a simple observation: when engagement doesn't work, it's usually not because people don't care. It's because the outreach didn't reach the right people, the format didn't work for everyone in the room, or the feedback never made it back into the program. Fixing all three together is what makes engagement actually function.

The three tables below provide concrete steps to take (as well as examples, context, and reflection questions) to address these challenges strategically and reach the overall goal.

HOW TO: DESIGNING OUTREACH AND ENGAGEMENT PROCESSES		
Challenge 1: Community members who would benefit most from CDBG programs are not consistently reached by or participating in engagement processes.		
Strategic Approach 1: Design outreach and engagement processes that are easy to access, welcoming, and include multiple pathways to participation.		
ACTION STEPS	**CONTEXT & EXAMPLES**	**QUESTIONS FOR REFLECTION**
Build relationships with trusted community leaders and organizations who are on the front lines and prioritize their voices in shaping engagement processes and outreach.	▪ Hire community members and/or partner with organizations that are genuinely trusted by the people the program is trying to reach. ▪ Create open communication lines so they can come to you when they see a need and/or have a solution.	▪ Have you partnered with community-based leaders or organizations who are genuinely trusted by the potential program users you are trying to reach, and in particular by folks you have not successfully reached before?

	▪ Recognize that trust is earned and requires patience, persistence, transparency, and walking the walk (GMM Ch. 4, 4.2).	▪ Are you moving past one-way relationships by genuinely showing up for and offering reciprocal support to community partners?
Meet people where they are, both to inform them about opportunities and to do the engagement itself.	▪ Work with partner organizations to hold engagement activities at times and locations that work for working families, and account for food, childcare, and transportation needs (GMM Ch. 4, 4.2). ▪ Publicize information in multiple languages and place it where people already get their information, not just the local newspaper or the Grantee's website (GMM Ch. 4, 4.4 and 4.5).	▪ Is this meeting/event/gathering at a time and place that will feel safe, comfortable, supportive, and available for the people you are trying to reach? ▪ Have you maximized the potential to participate through childcare, food, transportation, language access or other needs? Is there a hybrid option for people who cannot attend in person, and can folks access it from a smartphone? ▪ Is the event recorded, posted, and findable where communities access information?
Proactively create safe and welcoming spaces for engagement.	▪ Let people of all backgrounds and life circumstances know they are welcomed. ▪ Ask the people you are serving what they need to feel safe and comfortable. ▪ Provide options if they are unsure and follow their lead. ▪ Use community-centered terms such as "resident" instead of "citizen" (GMM Ch. 4, 4.2).	▪ Have you asked the people you are engaging what they need to feel safe and comfortable? ▪ Are you communicating through words and actions that help people feel they belong?
Provide meaningful engagement opportunities that allow people from all backgrounds and with varying life situations to be able to participate.	▪ Guarantee access in multiple languages (GMM App. E, 2.4), consider the needs of people with disabilities and different learning styles, and proactively advertise available support.	▪ Do people with disabilities, working families, or people who speak languages other than English have to jump through burdensome hurdles to have their needs met?

	▪ Provide hybrid meeting models that are accessible from a smartphone. ▪ Include a variety of methods such as stakeholder interviews, focus groups, community meetings, online and in person. ▪ Make meeting minutes public (GMM Ch. 4, 4.2 and 4.5).	▪ Is the language you are using easy to understand to people who may not be familiar with government terminology?

HOW TO: DESIGNING OUTREACH AND ENGAGEMENT PROCESSES

Challenge 2: Engagement processes do not consistently create conditions where all community members feel safe and empowered to share.

Strategic Approach 2: Create engagement spaces that honor multiple ways of knowing, and communicating; that make space for emotion, story telling, and responsiveness; and that account for the real experiences of community members.

ACTION STEPS	CONTEXT & EXAMPLES	QUESTIONS FOR REFLECTION
Recognize and address imbalances in engagement settings that often occur by default when people from multiple vantage points and with differing roles come together.	▪ Many engagement processes (including seating arrangements, meeting and public comment formats, etc.) frame the presenters as experts and community members as lay people. This creates an imbalance that can silence and/or skew community feedback. ▪ Be proactively transparent about your intent to learn from and incorporate the expertise of the people who live their lives closest to the issue at hand. ▪ Work to ensure that participation is easier to access for everyone you are trying to reach (GMM Ch. 4, 4.2). ▪ Co-develop shared community agreements in working groups. These agreements describe how the group will approach conflict and	▪ Have you critically examined your own position and role within the engagement process? ▪ Have you thought intentionally about how to frame the engagement process so that people understand that you view their expertise as valuable? ▪ Are you respecting people's agency to engage or not in ways that feel affirming? ▪ Have you co-designed community agreements that you can use to hold the container of the space so that everyone feels safe to participate?

	disagreements, distribute airtime fairly, actively listen to understand, etc. They are helpful tools to support productive collaborative meetings, especially when people are coming in from different vantage points. Building these as a group can lead to buy-in and collective safety.	
Make space for emotions and for a variety of ways of knowing, being, and communicating.	▪ Many community members have had adverse experiences with government, and emotional expression may be a natural response. Institutional norms, such as the expectation that emotions do not belong in professional settings, can be deeply exclusionary to people who have experienced such harm. ▪ Develop **healing-informed** spaces and be flexible in recognizing participation in multiple forms (GMM Ch. 4, 4.2).	▪ Are you insisting that people leave their emotions at the door to participate, or are you making room for these emotions to be expressed in the room? ▪ Are you creating space for multiple communication styles (written, oral, symbolic, individual, collective), learning styles, and ways of knowing (traditional, lived experience)? ▪ Is there room in this space to acknowledge the harm that people have experienced and to begin to make repair by incorporating this feedback into meaningful changes?
Provide training for all staff involved in engagement on community responsive practices.	▪ Ensure all staff involved with the project have received training in the skills necessary for meaningful engagement (including facilitating difficult conversations, reflective listening, and shared decision-making), so they can approach engagement with the necessary awareness and attunement.[5]	▪ Have you hired community-based leaders from within the communities being served to do the facilitation and/or to train your staff? ▪ Has your staff been trained on community responsive engagement practices?

Healing-informed practices actively and intentionally dismantle and repair the damage caused by the harmful ecosystem described in Section 6.2. These practices go beyond conventional trauma-informed approaches that often focus solely on treating individuals and individual symptoms (relying on a victim narrative and a clinical, rather than communal, model of trauma. A healing-informed frame views individuals not merely as victims of trauma, but as agents of their own and their community's well-being.

HOW TO: DESIGNING OUTREACH AND ENGAGEMENT PROCESSES		
Challenge 3: Community input does not consistently and meaningfully shape program design and implementation.		
Strategic Approach 3: Build accountability systems that ensure community input drives program design, and communicate transparently about how input is being used.		
ACTION STEPS	**CONTEXT & EXAMPLES**	**QUESTIONS FOR REFLECTION**
Ensure that engagement is ongoing and informs program design and evaluation in meaningful ways.	▪ Build in and budget time for reflection and ongoing engagement. ▪ Build in time at the beginning of program design to look at past engagement, and ensure that at least one engagement opportunity is offered before the program is fully baked ▪ Ensure that the people closest to the issue are naming the benchmarks and outcomes and are evaluating the success of processes (GMM Ch. 4, 4.2).	▪ Are you honoring people's time, energy, and expertise by implementing their ideas and communicating transparently when some ideas cannot be implemented?
Monitor and evaluate engagement strategies for what is working and what needs to shift.	▪ Monitor how people heard about the opportunity, track who is showing up and who is missing, which ideas are being incorporated, and gather feedback from trusted partners about what they are hearing. ▪ Follow up with missing stakeholders to understand why they didn't participate.	▪ Did your engagement processes actually engage the community members who have the most to gain from your programs as well as the most to lose if your program doesn't meet their needs? ▪ Did you follow up with stakeholders who did not attend to understand why?
Collect demographic data during engagement activities. Disaggregate and analyze data (including comparing it to local census data) to help you assess who you are reaching and who you are missing.	▪ Track who is hearing about the opportunity, who is showing up, and who is missing. ▪ Measure this data against the demographics of the community you are serving to see if they match. (GMM Ch. 4, 4.2).	▪ Are you reaching the people in the community you intend to serve? ▪ What does the data tell you about who is missing, and what are you doing about it?

Be responsive to the needs and stated priorities of program users, rather than asking them to simply match the government's priorities.	▪ When a client makes a choice that may seem suboptimal in the eyes of the government, they likely have a reason. This, too, is an engagement opportunity, so ask them, and listen to them. People make decisions by weighing options against their priorities. (For example, when people make decisions that are not in their best economic interest, it may be because they are prioritizing something else more than the economic benefit, rather than because finances don't matter at all to them.) Listen to them and support them within the program given their priorities, rather than your own (GMM Ch. 9, 9.3).	▪ Are you honoring the expertise that people hold on their own lives by listening to them and working to ensure their stated needs are met? ▪ Are you engaging with community members from a place of openness and inquiry, leaving assumptions at the door, and letting them tell you what they need, value, and prioritize?
Use healing-informed processes that account for the stress that many community members have experienced.	▪ Be mindful of parts of the CDBG process that can be painful and/or harmful, such as burdensome data gathering, intrusive questions, describing neighborhoods in disparaging ways. ▪ Design engagement opportunities with this in mind: Work through issues with intentionality, communicate transparently, and address uncertainty and distrust with compassion (GMM Ch. 4, 4.2; Ch. 9, 9.1).	▪ Are you designing flexibility, support, and creative alternatives into your engagement processes? ▪ Are you hosting engagement in spaces that feel conducive to well-being, such as spaces where community members already gather, feel safe, with natural light and outdoor space?

Spotlight: Compensating Community Members for Sharing Their Expertise

Every person on the CDBG team, from those who create the NOFA to those who design programs to contractors and subrecipients, brings expertise and is compensated for their time. However, local community members, who hold meaningful and irreplaceable expertise on their own experiences and on how resources should be allocated, are often excluded from this resource allocation.

When low-income community members do not have a meaningful say in program design, they are stripped of their right to self-determination and community-determination. And the programs that are designed are simply less effective. For example, people who are unsheltered can offer nuanced expertise on how to design a program that will support them economically while affirming their dignity. They can tell you the kind of program that would be the most supportive, where it should be housed, how it should be staffed, where and how it should be marketed to reach them and their peers. And they can tell you about the programs that have been well-meaning but have failed to meet their needs and improve their well-being. Failing to compensate people for this invaluable expertise is exploitative and, because folks are already struggling economically, makes it impossible for many to participate. Federal regulations make direct compensation (gift cards, cash) difficult, viewing them as "income payments." And the most impactful time to engage is before CDBG funding is obtained, requiring Grantees to fund engagement up-front.

Options to fund compensation include:

- *Use defederalized program income to stipend/compensate community members for their time and expertise (GMM Ch. 6, 6.6).*
- *Seek non-federal funding such as general operating or grants supporting public engagement.*
- *Use CDBG administrative funds for childcare, food, or other support during meetings.*
- *When contracting a third party for outreach, write the RFP as a fixed/flat fee so the contractor can compensate participants from their operating budget.*

Spotlight: Identifying Issues Impacting Engagement

"With a very sparse population, community outreach remains our largest focus as information dissemination and transparency remain a public concern and priority. Our agency does not have a strong online presence but hope to improve this and have collaborated with other agencies and jurisdictions for social media and online outreach. Public engagement and outreach are our biggest concern, as all of our residents do not have access to transportation (public workshops), broadband/internet services, or subscriptions to local publications."
— 2022 Community Priorities Survey

GMM References

Chapter 4, Section 4 - Overview

Chapter 4, Section 4.2 - Public Participation Requirements

Chapter 4, Section 4.5 - Limited English Proficiency

Chapter 9, Section 9.1 - Relocation

Chapter 9, Section 9.3 - Displacement

City of Grass Valley Memorial Park, Photo Credit: Bjorn Jones

Marketing

A Community Responsive Approach to Marketing

Affirmative Marketing Plans ask Grantees to consider people who will not apply for programs without direct outreach or who will need assistance to complete applications, whether due to differences in language, ability, or unfamiliarity with government processes. Grantees are to figure out why people may not apply, take steps to address those issues, and record the results of their actions (GMM Chapter 4; GMM Appendix E).

The key difference between meeting the regulations and creating a meaningful marketing plan is whose perspective is centered. Centering the government lens can show up as: making assumptions about why people are not participating, describing people as "hard to reach" rather than recognizing that they have been under-resourced, disparaged, or overlooked, and rigidly using one-way, print-only messaging without developing meaningful relationships. Centering community members means: asking people what they need and honoring their priorities, building reciprocal relationships, creating multiple outreach pathways, acknowledging the need to strengthen relationships, and then being nimble based on what is and is not working.

A Strategic Approach to Marketing

Identify community hubs (groups, organizations, online communities, and other locations where people naturally gather) as part of your strategy. Partner with Community-Based Organizations (CBOs) and leaders who have established deep relationships with the community members you want to reach.

The first table below outlines the goal, the challenges, the overall strategic approaches, and the ways to measure success during the marketing process. This table is followed by three additional tables that take each Strategic Approach and break it down into concrete steps.

A SNAPSHOT: COMMUNITY RESPONSIVE APPROACHES TO MARKETING			
GOAL	Community members who would benefit from CDBG programs know about them, understand how to access them, and feel welcomed to apply, so that programs serve the people they are designed to serve.		
CHALLENGES	**1**	**2**	**3**
	People who would benefit most from CDBG programs do not know about them or do not receive information in a way they can act on.	Marketing materials and methods do not consistently build the trust needed for people to engage with government programs.	Application processes create issues that prevent otherwise eligible community members from participating.

ROOT CAUSES	Outreach relies on channels (such as the English language newspaper) that do not reach the people who stand to benefit most.	Many people who CDBG is meant to serve are skeptical of government support due to past experiences. One way communications that seek to solely inform does not build the trust necessary to overcome this.	Applications are complex, not available in needed languages, or require resources (technology, transportation, time) that create obstacles for many users.
STRATEGIC APPROACHES	Meet people where they are and where they get their information by using multiple channels and languages informed by community partners. Ensure that the messaging lets communities know they are safe and belong in your programs.	Build authentic, reciprocal relationships (partnerships based in mutual respect, trust, and service) with CBOs and community leaders at community hubs, and be transparent about goals and processes.	Provide hands on support to complete applications, remove obstacles, and be overtly welcoming to people of all backgrounds (by explicitly offering support and making clear the kinds of support available).
MEASUREMENTS OF SUCCESS	Application initiation rates among community members who have not previously applied for CDBG programs increase.	Community members report that outreach felt trustworthy, respectful, and responsive to their needs.	Application completion rates increase among community members who have historically not participated in CDBG programs.

Why it Works

Getting the word out only works if it reaches the right people in a way they can act on. A flier posted at city hall or an email blast posted to a website might satisfy a requirement, but it won't reach someone who doesn't check the website, doesn't pass that building, or doesn't yet have reason to trust that a government program is meant for them. For many low-income community members, past experiences with government programs have given them good reason to be skeptical. Marketing that ignores this, that just broadcasts information and waits, isn't going to break through. What does break through is when a trusted person in the community is the one making the ask, in a setting that already feels familiar and safe. Even when someone does hear about a program and wants to apply, the application process itself can get in the way. When institutions make it easy to get help, ask for feedback on what's not working, and actually change things as a result, they stop losing people at the finish line and they start building the kind of reputation that spreads on its own.

The three tables below provide concrete steps to take (as well as examples, context, and reflection questions) to address these challenges strategically and reach the overall goal.

HOW TO: DESIGNING MARKETING PROCESSES		
Challenge 1: People who would benefit most from CDBG programs do not know about them or do not receive information in a way they can act on.		
Strategic Approach 1: Meet people where they are and where they get their information by using multiple channels and languages informed by community partners. Ensure that the messaging lets communities know they are safe and belong in your programs.		
ACTION STEPS	**CONTEXT & EXAMPLES**	**QUESTIONS FOR REFLECTION**
Work with community-based leaders to identify the best strategies for reaching community members, and co-create outreach approaches.	▪ Consider doing outreach at community hubs such as family resource centers, schools, libraries, sport venues, or faith groups (but respect that some hubs may be treated as sacred and not to be entered by a governmental entity). ▪ Follow the lead of CBOs about what works within their community, rather than merely asking them to co-sign on your ideas or spread your information around. ▪ Look for traditional and non-traditional media and platforms, including social media, email blasts from trusted community partners, etc. (GMM Ch. 4, 4.3).	▪ Are you making space to co-create strategies for outreach with community-based leaders and organizations, or mostly seeking their input on your ideas? ▪ Are you flexible enough to change how you usually do things to incorporate community suggestions?
Create multiple outreach pathways.	▪ Do direct outreach AND social media posting AND radio PSAs. ▪ Base the pathways on what your key partners tell you about where and how people get their information. ▪ Be willing to get creative: videos, graphics, cartoons, tabling at community events, knocking on doors, etc. (GMM Ch. 4, 4.3).	▪ Are you using multiple channels of communication? ▪ Are these decisions based on guidance from your community-based partners?

Share in multiple languages and use multiple forms of communication.	▪ Conduct marketing in the languages that your community members speak, including ASL and braille, and as a combination of written, verbal, in-person, and remote. ▪ Offer translation and interpretation support (GMM Ch. 4, 4.3).	▪ Do you offer marketing content in languages that all of the community members you are trying to reach speak? ▪ Are you ready to offer translation and interpretation support, including when people come to you with questions?
Do direct outreach.	▪ Face-to-face interactions are labor-intensive AND most effective. ▪ Pay people from within the low-income communities you are trying to reach to do the outreach if internal bandwidth or community trust is low (GMM Ch. 4, 4.3). ▪ Ensure that the people you hire have space to co-design methods with you and bring feedback to you that will be incorporated.	▪ Is your direct outreach focused on identified community hubs and areas where the people who are least likely to know about CDBG programs but most likely to benefit are already congregating? ▪ Are you working with members of the low-income communities you want to engage?

HOW TO: DESIGNING MARKETING PROCESSES

Challenge 2: Marketing materials and methods do not consistently build the trust needed for people to engage with government programs.

Strategic Approach 2: Build authentic, reciprocal relationships (partnerships based in mutual respect, trust, and service) with CBOs and community leaders at community hubs, and be transparent about goals and processes.

ACTION STEPS	CONTEXT & EXAMPLES	QUESTIONS FOR REFLECTION
Prioritize authentic relationship building at community hubs.	▪ This requires reaching out in non-transactional ways, offering support without expecting it in return, being vulnerable, curious, and humble. For example, volunteer at the community hub on events that matter to them, and get to know the people there.	▪ Are you investing in authentic relationships or only reaching out when you need something? ▪ Are your goals, timelines, and processes reflective of the time and reciprocity needed for real relationship development?

	▪ Work to learn protocols for engaging with each organization, and compensate the community members who share this expertise with you fairly (GMM Ch. 4, 4.3; App. B, Section 2.2).	▪ Have you set aside administrative funds or defederalized funding from prior programs in order to stipend community expertise? (See Spotlight in Section 2.2)
Acknowledge that for many low-income community members, past (and present) interactions with government have had a negative impact, and work to build trust through transparency and patience.	▪ Practice patience. Trust takes time, and actions speak louder than words. ▪ Show up with humility, receive feedback with grace, communicate transparently about how feedback will be integrated, and respect people's wariness by not pushing the Grantee's agenda.	▪ Do your actions and expectations match your stated desire for trust and partnership? ▪ Are you being transparent with your goals and process? ▪ Can you withstand the discomfort that arises when you learn about the impact of the actions you have taken, and do you consistently address those impacts?
Be overtly welcoming to people from all backgrounds.	▪ Be aware of what may get in the way in interactions with applicants. ▪ Ensure that all people get compassionate treatment and needed support, regardless of how much support they ask for. ▪ Utilize signage and icons to signal safety and consideration. ▪ Proactively communicate the supports available and that they are available to all applicants, no questions asked.	▪ Are you offering support proactively, not just waiting for it to be requested? ▪ Are you treating people as whole human beings by checking in with them before jumping into business? ▪ What verbal and non-verbal indications are present to indicate physical and emotional safety?

HOW TO: DESIGNING MARKETING PROCESSES		
Challenge 3: Application processes create issues that prevent otherwise eligible community members from participating.		
Strategic Approach 3: Provide hands on support to complete applications, remove obstacles, and be overtly welcoming to people of all backgrounds (by explicitly offering support and making clear the kinds of support available).		
ACTION STEPS	**CONTEXT & EXAMPLES**	**QUESTIONS FOR REFLECTION**
Provide assistance to complete necessary applications or paperwork.	▪ Offer computers, Wi-Fi, private spaces, and technical support. ▪ Have flexibility to help during evenings and weekends. ▪ Be sure you have the capacity to help before offering, as empty offers will erode trust. ▪ Communicate transparently when you genuinely cannot meet a need and work internally to adjust (2023 HCD Strategic Sessions).	▪ Do you provide the tools needed to complete applications? ▪ Is it easy for people to contact you in their preferred language for support? ▪ Are you building capacity to increase support offerings when there is a need that you cannot yet meet?
Get feedback from low-income community members about what works and does not work for them in the application process, reflect on it with an open mind and heart, and apply it.	▪ Find out which strategies worked and which did not, including feedback on outreach methods, communication style, and approachability. ▪ Shift strategies based on feedback. ▪ Ask about their experience with the application process. ▪ Feedback is a gift; treat it as such.	▪ Do you have methods to solicit feedback? ▪ Do you make time to review feedback and adjust processes? ▪ Do you collect demographic data in your feedback process so that you can understand the ways in which different people experience your processes?

Spotlight: Gathering Input and Elevating Marketing Support Needs

"It's important to garner public input in order to design programs that are most beneficial to the community. In the past year, the City has organized/attended monthly meetings with the community in [our jurisdiction], to gather input and work on solutions to the blight and challenges that surround that area. [The] City has presented available City Programs to community leaders and received input on need. This is an ongoing conversation. The City is a small, rural community with not a lot of capacity to create and fund new programs and take on all of the new requirements. The City could use [Technical Assistance] with ideas for marketing, sample contracts, sample evaluations to better reach gaps."
— 2022 Community Priorities Survey

GMM References

Chapter 4, Section 4.3 (Affirmatively Furthering Fair Housing).

City of King Sidewalk Improvement Project, Photo Credit: Octavio Hurtado

Language Access

A Community Responsive Approach to Language Access

Language difference is one of the most easily identifiable obstacles to public participation. As of 2021, 44% of Californians ages 5 and older speak a language other than English at home. The most commonly spoken languages besides English are Spanish, Chinese, and Tagalog, though at the local level there is wide variation.

Language access, the government's responsibility to provide services regardless of a person's primary language, is protected by numerous federal and state laws, including Title VI of the Civil Rights Act of 1964 and the California Dymally-Alatorre Bilingual Services Act of 1973. Regulations require Grantees to create a Language Access Plan (LAP) starting with a four-factor analysis to determine which languages they must provide assistance in (GMM Chapter 4).

A community responsive approach to language access aligns with regulations AND focuses less on "statistical significance" and more on the ultimate goal: ensuring that every low-income person who stands to benefit from the CDBG program has meaningful access to it, including information, applications and application support—in a language they understand. In order to ensure this outcome, the Grantee must work closely with members of low-income communities to identify the language needs within their communities, and then proactively, provide high-quality communication in these languages and in multiple formats (verbal, written). It also means that providing translated materials must be coupled with the relational outreach to ensure that people know they will be able to understand and interact, and will actually attend.

A Strategic Approach to Community Responsive Language Access

Community responsive language access is interwoven with engagement and marketing. It can only be done well if the Grantee simultaneously builds relationships and creates trust by being responsive to community needs. It often requires partnership with people embedded in the community and with governing agencies who can pool and provide resources.

The first table below outlines the goal, the challenges, the overall strategic approaches, and the ways to measure the success of your language access strategies. This table is followed by three additional tables that take each Strategic Approach and break it down into concrete steps.

NOTE: The Ecosystemic Nature of Community Responsive Language Access

Grantees often do not have the bandwidth or staff capacity to provide sufficient support to language communities who meet threshold numbers, let alone additional language communities. Collaborate with other Grantees and/or HCD to pool and provide resources for front-facing staff. You likely do not have to reinvent the wheel in order to meet the needs of your community.

A SNAPSHOT: COMMUNITY RESPONSIVE APPROACH TO LANGUAGE ACCESS			
GOAL	Every community member can fully participate in CDBG programs regardless of preferred language, with high quality, proactive language support.		
	1	**2**	**3**
CHALLENGES	Communities speaking languages that do not meet four factor analysis thresholds are not consistently served.	Translation and language services do not consistently meet the quality standards needed for genuine communication and understanding.	Language access exists on paper but does not consistently result in meaningful participation by language communities.
ROOT CAUSES	Four factor analysis thresholds leave out smaller language communities, and resources are thin and concentrated on meeting minimums.	Word for word translation does not account for cultural context, regional variation, or the subject matter knowledge of the recipient (including government speak), and quality accountability mechanisms are rare.	Providing translated materials is necessary but not sufficient. Without relational outreach and trust building with these communities, translated fliers alone do not drive attendance or participation.
STRATEGIC APPROACHES	Develop relationships with low income community members and leaders who speak languages other than English, and work to ensure that all community members are able to navigate information about CDBG.	Prioritize effective, high quality communication by going beyond word for word translation to ensure that meaning is conveyed and understood.	Pair translated materials with proactive, relational outreach to language communities, and pool resources across Grantees and with HCD.
MEASUREMENTS OF SUCCESS	All low income community members, regardless of the languages they speak, are receiving services and participating in CDBG processes.	Community members report that they fully understand communications and feel the quality of language services meets their needs.	Attendance and participation from language communities increases in proportion to the outreach and relationship investment.

Why it Works

Having a document available in another language is not the same as making a program accessible to the people who speak that language. If they never see the document, or they see it but can't get follow-up support in that language, or the translation is technically correct but doesn't quite land, the practical result is the same as if nothing had been translated at all. The compliance threshold approach also has a quiet built-in problem: the communities it leaves out are the least likely to show up and say so. Smaller language communities, by definition, don't meet the numerical cutoffs, and so they remain outside the process, invisibly. Shifting the question from "do we meet the threshold?" to "can everyone who qualifies access the program?" changes what gets prioritized and how success gets measured. It also makes clear that no single jurisdiction can do this fully on its own. Sharing translated materials across jurisdictions, building shared resources, and getting real support from the state level isn't a workaround. It's just how this works at any meaningful scale.

The three tables below provide concrete steps to take (as well as examples, context, and reflection questions) to address these challenges strategically and reach the overall goal.

HOW TO: DESIGNING LANGUAGE ACCESS PROCESSES		
Challenge 1: Communities speaking languages that do not meet four factor analysis thresholds are not consistently served.		
Strategic Approach 1: Develop relationships with low income community members and leaders who speak languages other than English and work to ensure that all community members are able to navigate information about CDBG.		
ACTION STEPS	**CONTEXT & EXAMPLES**	**QUESTIONS FOR REFLECTION**
Develop reciprocal relationships with members and leaders of language communities.	▪ Reciprocal relationships by definition cannot go in one direction. If you are asking to attend events only when it furthers your own goals, or if you are only checking in with folks when you need something from them, the relationship is primarily one-directional. ▪ To build more genuine relationships, attend and help sponsor local events within language communities, support local Community-Based Organizations (CBOs), learn about what they are prioritizing, amplify their work, and get to know and learn from the public-facing staff who directly engage with the community.	▪ Have you invested in true partnerships that go beyond the superficial, where information and support flows both ways? What are you learning from them? How are you supporting them? ▪ Are you building relationships with people who directly work with the language communities you want to engage?

Provide all notices in languages reflected in the local, low-income community.	▪ When providing notifications, offer them in the preferred language of the recipient along with interpretation services, even if not reflected in the four-factor analysis. (GMM Ch. 9, 9.6). ▪ If you are struggling to meet the needs of a language community, work with qualified CBOs and leaders to secure translation and interpretation services.	▪ What are the languages spoken within the low-income communities CDBG is intending to serve? ▪ Are you providing notices and interpretation in a recipient's preferred language?
Pool resources with other Grantees and seek HCD support for language communities whose needs you are struggling to meet.	▪ Share translated documents, notices, and brochures with other Grantees. ▪ Reach out to other Grantees, and to HCD, when you are struggling to meet the language needs of your community members. They may have already created the documents you are looking for. (GMM Ch. 4, 4.3; Ch. 7, 7.5; Ch. 9, 9.2).	▪ What would it take to share translated documents and create a pool of resources? ▪ What do you already have translated that you can share?

HOW TO: DESIGNING LANGUAGE ACCESS PROCESSES

Challenge 2: Translation and language services do not consistently meet the quality standards needed for genuine communication and understanding.

Strategic Approach 2: Prioritize effective, high quality communication by going beyond word for word translation to ensure that meaning is conveyed and understood.

ACTION STEPS	CONTEXT & EXAMPLES	QUESTIONS FOR REFLECTION
Prioritize effective communication by hiring qualified translators who understand cultural context.	▪ Ensure that notices like the General Information Notice (GIN) and Initiation of Negotiations (ION) are accompanied by language-appropriate assistance at the time of notice. Ask if recipients understand the implications in a way that feels safe for them to say no (GMM Ch. 9, 9.1; Ch. 9, 9.3).	▪ How do you know if what you communicated was actually understood? ▪ Is your translator able to communicate in community responsive ways? ▪ Are there phrases in this content that can mean different things depending on region, even within the same language group?

	▪ Work with translators and interpreters who are able to communicate in ways that are responsive to the values and communication styles of the people being served.	
Ensure high-quality communication by holding yourself accountable to meeting community members' language needs.	▪ Implement feedback mechanisms where recipients can share feedback when interpretation does not meet their needs or perpetuates a gap in understanding. ▪ Set understanding as the benchmark of success when providing interpretation.	▪ Does this translation accurately reflect the same content as the English version? How do you know? ▪ Do recipients have a way to report when language services do not meet their needs?
Ensure that people have language access within complaints and appeals procedures.	▪ Grantees can support each other with peer-sharing and template language that is clear, accessible, and translated into multiple languages (GMM Ch. 4, 4.11).	▪ Are your complaints and appeals procedures easy to access and navigate regardless of preferred language? ▪ Are you communicating about the existence of these procedures in all of the languages spoken by the people CDBG is serving?

HOW TO: DESIGNING LANGUAGE ACCESS PROCESSES

Challenge 3: Language access exists on paper but does not consistently result in meaningful participation by language communities.

Strategic Approach 3: Pair translated materials with proactive, relational outreach to language communities, and pool resources across Grantees and with HCD.

ACTION STEPS	CONTEXT & EXAMPLES	QUESTIONS FOR REFLECTION
Proactively provide translation and assistance, rather than placing the burden on the recipient to request it.	▪ Ensure the offer of translation or interpretation is made in the preferred language of the community member. For example, an offer of Vietnamese translation made in English is unlikely to increase Vietnamese engagement (GMM Ch. 8, 8.3; Ch. 4, 4.2 and 4.5).	▪ Are you proactively offering and alerting language communities about translation support?

Use information channels that are already being used by community members to get their information, and ensure that you are using the language spoken by people who get their information there.	▪ Seek out bilingual radio stations, news media, and CBO newsletters. ▪ Advertising the availability of Spanish interpretation in an English-language newspaper will not meet the need (GMM Ch. 4, 4.2).	▪ Have you used information channels that are trusted in the communities you want to notify? ▪ Are you ensuring that the languages you are using in those channels are aligned with the languages spoken by the folks who get their information there?
Be transparent and proactive in directly alerting language communities to the access that is available.	▪ When advertising that an ASL interpreter is available, do outreach directly to the Deaf community to invite them. Otherwise, turnout may not match intent. Identify community hubs for the Deaf community and build relationships. (GMM Ch. 4, 4.2).	▪ Have you proactively reached out to communities to alert them that language access is available? ▪ Have you made it easy for as many community members as possible to know what services are available?
Hold engagement at community hubs in neighborhoods where language support already exists.	▪ Work with community-based leaders to identify trusted community hubs as engagement venues where these languages are regularly spoken: resource centers, churches, local businesses, parks, or schools. ▪ Ensure ADA compliance and public transportation access (GMM Ch. 4, 4.2).	▪ Are your engagement events in hubs that are used by low-income community members who speak languages other than English? ▪ Are these engagement events at times when people can attend? ▪ Are you working with leaders here to ensure that the language your interpreters are using are aligned with the people being reached?
Partner with and compensate CBOs and community-based leaders and do support services in their communities.	▪ Build relationships with CBOs who are more likely to have multilingual staff. ▪ Ensure supports like childcare, transportation, and food are provided in the recipient's preferred language and cultural ways. ▪ Always make sure you can provide the support first, as unfulfilled promises erode trust (GMM Ch. 4, 4.2).	▪ Is your partner authentically connected to their community? ▪ Do they have leadership and staff who speak the languages of the community they serve? ▪ Do you, and they, have the capacity to follow through on support services before offering them?

When documenting the effectiveness of a Language Access Plan, engage the people who use these services in evaluating their effectiveness.	▪ Monitor actual effectiveness by gathering feedback from users, or by noticing if no one who speaks a particular language is using services and exploring why (GMM Ch. 4, 4.5).	▪ Are community members using the LAP offerings? If not, why? ▪ Are you engaging low-income community members who speak languages other than English in learning about what is and is not working, and then applying the feedback?

Spotlight: Struggling to Meet the Language Needs of Community Members

"There is a small sector of the county where a small group of Hmong [people] are now residing, and we would like to be able to reach out to them but don't have a bilingual Hmong person living in the county and outreach is where it is needed. The language line is not available for outreach efforts in remote sections of the county." — 2022 Community Priorities Survey

"[Our community] has the need of translation services primarily for our Spanish speaking residents. We have had an interpreter in the past but not consistently and this makes applying for programs difficult. We would like to have our forms translated into Spanish to make the process easier. Engagement with our Hispanic residents has also been a challenge. We've held meetings with a translator, but they have not been widely attended."
— 2022 Community Priorities Survey

Spotlight: Providing Wraparound Support

"I know cities within [a jurisdiction I work with] make extended efforts to provide materials and workshops in Spanish. Before amending their contract, [one City] conducted workshops in Spanish on how to complete the business assistance application and reviewing documentation because [the] majority of applicants only spoke Spanish and had never applied for assistance before." — CDBG-CV Grant Administrator

City of Marysville Wildland Firetruck, Photo Credit: Fire Captain Matt Lichenstein

Document List for Translation

Translation of vital documents (paper or electronic written material that contains information that is critical for accessing a program or activities) is required. For instance, if a complaint form is necessary to file a claim with an agency, that complaint form would be vital. Non-vital information includes documents that are not critical to access such benefits and services.

Examples of vital documents include, but are not limited to:

- *Applications for Assistance*
- *Fair Housing Posters*
- *Notices, such as: General Information Notice (GIN), Initiation of Negotiations (ION), Notice of Denial of Claim, Move-In Notice, Sample Notice to Prospective Tenants, Notice of Eligibility - eligibility for Relocation Assistance, Notice of Non-Displacement - notice that you will not be displaced after all, Notice to Owner, Notice of Intent to Acquire, Temporary Relocation Notice - rights and conditions of a temporary move, 90-day Notice.*
- *Notices informing people of their rights (ex: per URA requirements GMM Ch. 9, 9.2).*
- *HUD brochures, such as: "When a Public Agency Acquires Your Property," "Relocation Assistance to Displaced Homeowner Occupants," and "Relocation Assistance to Tenants Displaced from Their Homes."*
- *Notice of Public Hearing*
- *Wage rate decision and Wage Rate Poster "Employee Rights under the Davis Bacon Act"*
- *Marketing Materials (fliers, posters)*
- *Bid Notices*
- *Complaint Policy, Procedure, and Forms*

GMM References

Chapter 4, Sections 4.2, 4.3, 4.5, 4.11

Chapter 7, Section 7.5

Chapter 8, Section 8.3

Chapter 9, Sections 9.2, 9.3, 9.6.

Part III: WORKFORCE RELATIONS

Introduction

Community Development Block Grants are meant to invest in the economic and overall well-being of low-income individuals and communities. While the primary lever for achieving this is generally considered to be in the quality and reach of the programs themselves, Grantees have the opportunity to leverage other parts of the process to infuse financial resources into local low-income communities. Grantees can (1) procure local businesses who hire local, low-income workers, (2) hire low-income workers and pay them thriving wages, and (3) contract with local nonprofits who do the same. These strategies can create economic stability for low-income folks, thereby reducing the need for future programs and benefitting the community as a whole. For example, a housing program functions as an economic development program insofar as contractors, subrecipients, and workers are hired and paid to do the work. The more of this that is done efficiently, effectively, and locally, the truer the work is to the mission of CDBG.

Procurement

CDBG grants are meant to invest in the well-being of communities and create economic stability for low-income people and communities. In order for that to happen, the CDBG project must:

1. *Attract and have their projects bid upon by competent contractors,*
2. *Be completed efficiently and effectively by selected contractors in community responsive ways, and*
3. *Keep the money at every step (including the design and implementation of the program itself) in the hands of low-income community members.*

This is not often a smooth process. Sometimes, Grantees struggle to attract bidders at all, let alone multiple bidders. When Grantees are able to find and contract with bidders, these contractors often do not complete the work in a way that is truly aligned with the needs, priorities, and values of the low-income community members being served by the program. Additionally, opportunities are often missed to keep money in the hands of local, low-income community members, such as when contractors from elsewhere bring in employees from the outside, or when their pay/hiring structures do not support the economic stability of their low-income employees.

Spotlight: Juxtaposing Fiscal Responsibility with Thriving Communities

There is a tension in the implementation of CDBG and all federally funded programs that infuse money into small businesses and businesses owned and operated by people who are low income. The government has a responsibility to both taxpayers and to the end users of CDBG programs to spend money efficiently. For example, by granting contracts to the lowest bidders, and the regulations stipulate that in most construction projects, the Grantee can only consider and choose the lowest bidder. This allows the government to fund more programming for more people. But when a part of the purpose of the program, as is true with CDBG, is to invest in the businesses themselves, paying as little as possible is actually a form of disinvestment. Businesses that are small and have fewer resources may need more flexible spending options and faster reimbursements than larger firms with broader capacity.

As one HCD staff member said, "It would be better to pay smaller businesses more—to help grow business and find more opportunities—don't nickel and dime small businesses."
—2023 HCD Strategic Sessions

Town of Mammoth Lakes Access Apartments Rehabilitation, Photo Credits: Eastern Sierra Community Housing

A Strategic Approach to Procurement

The strategies in this section will help to simultaneously expand the pool of bidders and attune CDBG programming more closely to community priorities. This makes the Grantee's job easier and aligns CDBG's impact more closely with the intent of the National Objectives.

Overall, it is important to learn from low-income community members about the businesses and nonprofits in their community who have earned their trust and speak to their needs and values. Then apply these learnings by creating genuine relationships with these businesses, asking them what they need in order to participate, and providing that support.

The first table below outlines the goal, the challenges, the overall strategic approaches, and the ways to measure success during the procurement process. This table is followed by three additional tables that take each Strategic Approach and break it down into concrete steps.

A SNAPSHOT: COMMUNITY RESPONSIVE APPROACH TO PROCUREMENT			
GOAL	Grantees reliably receive bids from and are able to contract with qualified firms who execute quality, efficient, community responsive work, while simultaneously deepening investment in the local economy.		
CHALLENGES	**1**	**2**	**3**
	Grantees do not consistently receive bids from qualified firms.	Firms that bid and contract are not consistently able to perform community responsive work.	Opportunities to leverage the procurement process to infuse dollars into the local economy are missed.
ROOT CAUSES	RFP/RFQ processes are often designed in ways that exclude qualified businesses.	The processes for bidding and awarding contracts generally do not prioritize community responsiveness.	Grantees do not have relationships with local, community responsive businesses that are run and/ or staffed by low income community members.
STRATEGIC APPROACHES	Design RFP/RFQs and the processes for response so that they are accessible and attractive to the largest possible pool of applicants.	Design the RFP/RFQ process, from the document itself through the evaluation and award process, in such a way that it prioritizes community responsive work.	Build relationships with businesses that are run by and/or hire local community members and that pay them sustainably.
MEASUREMENTS OF SUCCESS	Grantees receive more and/or adequate bids on CDBG projects and are able to reliably enter into a contract.	Programs are implemented effectively in the eyes of community members, including community members who are new to participation.	Funding stays as localized as possible so that community well being extends beyond the end users of the program.

City of Crescent City Pacific Pantry, Photo Credit: City of Crescent City

Why it Works

In an ideal world, Grantees would easily be able to procure local businesses who do efficient, effective, community responsive work and who pay their local, low-income employees wages and benefits that allow them to thrive. If this were the case, the Grantee's job would be easier, CDBG programming would be more effective, and more money would be invested in the low-income communities that CDBG is intended to serve.

The strategies here effectively address the challenges to this outcome because these challenges are inherently interwoven. A program that can't find contractors is a nonexistent program, and the Grantee will have to return the money. If the Grantee receives only one bid, they may have a program, but potentially one that is lower quality than it could have been. A Grantee that struggles to find contractors is having their time and energy directed away from the most important components of CDBG. Local businesses that do not participate are businesses that miss an opportunity to improve their (and their staff's) economic well-being. In such cases, the impact of the CDBG program remains limited to the end-user, minimizing the impact of CDBG funds.

CDBG regulations are meant to protect the government, the taxpayer, and the community being served. So are the requirements put into RFPs. They are intended to ensure that the businesses procured are qualified, competent, and good faith actors, who can execute the work effectively and efficiently. But these requirements are also proxies, and they do not always account for the realities faced by small local businesses. Shifting RFPs to account for these realities can expand the potential pool of applicants without sacrificing quality. Grantees have more businesses to choose from, and local businesses who employ low-income community members are able to participate where they were not before. These are often the businesses that truly have the pulse on community needs, because they are run and staffed by community members, so they are better able to do the work in community responsive ways. And paying these businesses to do the work keeps the money local.

The three tables below provide concrete steps to take (as well as examples, context, and reflection questions) to address these challenges strategically and reach the overall goal.

HOW TO: DESIGNING PROCUREMENT PROCESSES		
Challenge 1: Grantees do not consistently receive bids from qualified firms.		
Strategic Approach 1: Design RFP/RFQs and the processes for response so that they are accessible and attractive to the largest possible pool of applicants.		
ACTION STEPS	**CONTEXT & EXAMPLES**	**QUESTIONS FOR REFLECTION**
Look through all minimum requirements in RFP/RFQs for unnecessary ones. Many requirements are based on narrow definitions of competence and experience. They can exclude businesses that have fewer resources and administrative support and/or businesses that are qualified but have developed their qualifications and skills in alternative ways.	▪ For example, if an RFP/RFQ requires firms to have multiple years of experience working with governing entities, the pool—by definition—will not expand beyond the businesses already in it. ▪ It is important to remember that while prior government experience can be helpful, it is only one of many forms of experience. Government experience does not clarify whether the work was done in community responsive ways, and there is no evidence that companies that have not yet worked with government are incapable of doing so well.	▪ What are alternate ways that companies can prove that they can do the work required? Are examples of those pathways included on the RFP/RFQ? Have you made it clear that you are open to even more alternatives? ▪ Have you asked local businesses who are trusted by low-income community members and who you are interested in partnering with about their experience pathway, so that it can inform the examples you include on the RFP/RFQ?
When determining cost estimates to put into the RFP/RFQ, talk with small, local businesses with fewer resources to ensure that the estimate is aligned with their financial realities.	▪ When creating federally required independent cost estimates, ask local small businesses to weigh in, come up with a range that accounts for the distinctions between well-resourced and under-resourced firms, and make sure that the process does not exclude the businesses consulted from subsequent bidding (GMM Ch. 5, 5.9). ▪ For example, if you are doing a demolition project, rather than sharing an RFP or scope-specific details, create a hypothetical standard, such as a 1200 sq/ft home to demo, and ask small, local firms for quotes to inform your ICE. This way you can incorporate the needs of firms with varying costs/resources/capacity without disqualifying them from applying.	▪ Have you sought input from small, local, community responsive firms on your cost estimates before releasing an RFP or RFQ? ▪ Have you ensured that your process for seeking this information does NOT exclude the local small businesses that you are seeking advice from? ▪ Have you created a range of cost estimates that accounts for the constraints of under-resourced firms?

Eliminate procedural and financial obstacles to small businesses, including the challenges created by not having pre-existing ties to government entities, and those created by built-in payment delays.	▪ Streamline RFP/RFQ processes and documentation requirements so that they get at what is needed without becoming onerous. ▪ Once you have selected a business, provide payment every 30 days, rather than 60 or 90, to reduce the financial burden (GMM Ch. 5, 5.2) that is particularly unsustainable for small businesses.	▪ Have you asked small local businesses that you are interested in partnering with to look at your processes and show you where the obstacles to their participation exist? Have you followed that up with shifts? ▪ Have you looked at your general fund and any other funding mechanisms to see what you can leverage to pay your contractors in a timelier fashion than federal dollars allow for on their own?

HOW TO: DESIGNING PROCUREMENT PROCESSES

Challenge 2: Firms that bid and contract are not consistently able to perform community responsive work.

Strategic Approach 2: Design the RFP/RFQ process, from the document itself through the evaluation and award process, in such a way that it prioritizes community responsive work.

ACTION STEPS	CONTEXT & EXAMPLES	QUESTIONS FOR REFLECTION
Look through all requirements/ preferences included in your RFP/RFQs and add in preferences for community responsive work to your scoring matrices. Couple this with using the most open-ended bidding process that is allowed by the regulations.	▪ Think about the skill sets and background experiences that demonstrate community responsive work, add them into the RFP/RFQ documents as desired, and then put them in evaluation matrices attached to preference points. ▪ Depending on the project, these skill sets may include multilingualism and/or lived experience with the issue being addressed by the CDBG project. More generally, skill sets may include existing and trusted relationships within the local, low-income community, experience creating such ties and conducting ongoing engagement, etc.	▪ Does your RFP/RFQ process reflect a prioritization of community responsive work at every step? (Your own engagement, RFP/RFQ documentation, evaluation processes, etc.) ▪ How do you know that these processes reflect the desires of low-income community members you are seeking to serve? Who have you talked to to find your answers? Have you put this feedback into action?

Provide support to bidders/applicants that level the playing field, so that small, local, community responsive businesses and all businesses with limited resources, admin and backbone support, are able to bid and enter into contract.	▪ Create formal and informal pathways for interested businesses to let you know what they need in order to bid that you may not have already thought of. Reach out to businesses you would like to be in relationship with to specifically ask them about this. ▪ Then, do the best that you can to incorporate the needed support into the RFP/RFQ process.	▪ What processes have been created and advertised so that businesses are able to give feedback? Are they varied? ▪ Are there options for them to pick up the phone and call? Are they being called proactively? Is it written into the RFP process in a way that is flexible? ▪ Are they being asked open-ended questions, such as "What do you need?" or are they given examples of what they can ask for? Or both?
Ensure that outreach to all businesses, including any word-of-mouth outreach done with local small businesses, includes information about support that you are providing prospective applicants, and encourage folks to share what they need in order to bid and/or contract.	▪ Having support available will not expand the pool of bidders, and specifically of the small, community responsive businesses that you are looking to procure, if they are not well-known. (GMM Ch. 5, 5.2). ▪ Being upfront about it in the procurement documentation is paramount, but it is crucial to pair this with a one-to-one strategy of picking up the phone, to make sure that the businesses you'd like to see apply understand what's available to them.	▪ How is the information about available supports being provided to potential applicants? In writing? Verbally? Both? ▪ Is it hiding in the fine print, or is it up front and hard to miss? ▪ Is the tone of the communication warm and relational? Or cold and regulatory?
Retain an evaluation committee that is made up of people who do community responsive work and/or have experienced persistent service gaps. Be clear on the values that this committee is asked to uphold.	▪ The community members who you are seeking to reach, and especially the folks you have not reached before, are experts in what it does and does not look like to do work that is responsive to them, their priorities, and their needs. They know what the gaps look like, how to fill them and are best positioned to evaluate bids.	▪ Does your working definition of 'expertise' include forms that often go unrecognized, such as experience gleaned from living and navigating government services from the user perspective rather than from schooling or work? ▪ Have you taken this definition of expertise and applied it to your evaluation committee, so that it doesn't only include CDBG or building experts, but also includes people who have lived experience with persistent service gaps and the programs that do and do not effectively fill those gaps?

	▪ Because the mission of CDBG is to support members of low-income communities, it is crucial to include stipends for these community members, who do not have time to do unpaid work. Also seek to remove additional obstacles to participation. Look at meeting times, languages included, online vs. in-person, and childcare related obstacles.	▪ Are you ensuring that the participation of new folks is sustainable to them by providing stipends for participation and mitigating any other obstacles they experience?

HOW TO: DESIGNING PROCUREMENT PROCESSES		
Challenge 3: Opportunities to leverage the procurement process to infuse dollars into the local economy are missed.		
Strategic Approach 3: Build relationships with businesses that are run by and/or hire local community members and that pay them sustainably.		
ACTION STEPS	**CONTEXT & EXAMPLES**	**QUESTIONS FOR REFLECTION**
Build genuine relationships with local, small, community responsive businesses that you come into contact with during this process.	▪ Procuring small, community responsive businesses is more than one-way advertisements. Follow up on outreach with direct, one-to-one communication, take their calls, supply supports, work to understand their constraints and meet their needs. Learn about their business models and how they hire and resource their staff.	▪ What questions are you asking businesses you are forging relationships with so that you can truly understand the economic impact they have within the low-income community in your area? ▪ Do you know whom they hire, how secure in their jobs their workers feel, their pay and benefit scale?
When working with firms from outside the area, seek firms who will hire locally, pay well, and treat employees fairly.	▪ CDBG regulations state that a Grantee cannot give extra points in an evaluation process for locally-owned businesses. Additionally, in many small, rural areas, finding a locally-owned business to do the work may be difficult or impossible. But ignoring geography can lead to federal funding leaking out of the low-income community that is meant to be supported.	▪ What questions are you asking businesses you are forging relationships with so that you can truly understand the economic impact they have within the low-income community in your area? ▪ Do you know whom they hire, how secure in their jobs their workers feel, their pay and benefit scale?

	▪ There is nothing in the regulations that prevents Grantees from prioritizing (with evaluation points, during Competitive Negotiation processes) businesses who will hire local community members to do the work, or to look at compensation policies or other documentation that demonstrates that workers will be treated fairly and sustainably.	
Choose the most open-ended bidding process that the regulations allow for each component of the CDBG project. (This includes avoiding non-competitive negotiations and reducing competitive sealed bidding to the times when it is required by the regulations.)	▪ Use the Competitive Negotiation procurement method as much as possible in order to integrate selection factors beyond cost. Even in construction projects, this procurement method can be used for architectural, engineering, planning, and administrative services. Then, include community trust and local investment as weighted preferences in the selection process. ▪ Public emergencies and “inadequate” results from competitive negotiations have historically been cited as reasons to lean on non-competitive negotiations, but this can create loopholes that can be exploited against the interests of low-income communities. Using the other strategies in these tables to develop relationships with locally trusted businesses, expand the pool of bidders, and prioritize community responsiveness can render these reasons obsolete.	▪ How did you choose the bidding process you landed on? Does it allow you as broad freedom as you’d like in order to be able to prioritize the infusion of dollars into local low-income communities? ▪ Are there parts of this process where you inadvertently put constraints on your ability to prioritize local investment?

Mitigate the periodic unintended consequences on low-income workers of Competitive Sealed Bidding.	▪ When using the Competitive Sealed Bid process for construction work in projects such as housing rehabilitation programs for fewer than seven units, DBRA requirements are not triggered. Recognize that this can lead to safety shortcuts and outsourcing work. ▪ Invest fully in oversight, monitoring, and evaluation of labor standards in these situations.	▪ Does the bidding process used put workers at risk? How can you work to protect them when the regulations don't?
Move beyond the Supplier Clearinghouse, which is not an exhaustive list of qualified firms, to ensure that you are proactively working to build relationships with and procure community responsive businesses who hire locally and pay well.	▪ Find creative ways to advertise procurement opportunities: ▪ Talk to community members who are most in need of services but are least likely to have their needs met by traditional programs. Ask these community members about businesses that they trust and recommend, and ask them to make introductions for you. Then, follow up meaningfully and regularly. ▪ Look specifically for businesses staffed and/or owned by people who are low income and who have experienced persistent service gaps themselves so that they understand the nuances. ▪ Conduct outreach to community hubs that serve members of low-income communities, such as churches, schools, libraries, and resource centers.	▪ When conducting outreach to find local businesses beyond the Supplier Clearinghouse, are you talking to the right people and asking the right questions? ▪ How are you learning about businesses that locals trust and who will support the economic development of low-income communities? ▪ When a connection is made, are you reaching out and forming real relationships with them?

Spotlight: When Well-Intentioned Policy Undermines its Intent

Procuring a Section 3 Business is one way that Grantees demonstrate that they are creating job opportunities for people experiencing poverty. To be considered a Section 3 Business, a business must meet one of the following criteria: (1) The business is at least 51% owned by people who are classified as Section 3 Workers, (2) More than 75% of the labor hours performed by the business are performed by low- or very low-income persons, or (3) The business is at least 51% owned by people who currently live in public housing or Section 8-assisted housing.

And while procuring such a business may result in beneficial outcomes for employees who are low income, there are openings within this definition for the possibility of exploitation. Consider the second qualifier. A business that is earning large profits for its owners and/or high wages for a few employees in leadership positions while paying large numbers of people low wages to do most of the work would still qualify as a Section 3 Business under the second criterion (75+% of hours worked by low- or very low-income persons); all while having an impact on employees that does not align with the intent of the policy or the goals of CDBG.

Grantees have the opportunity, and indeed the responsibility, to do due diligence in procurement of Section 3 Businesses, to ensure that they are not rewarding exploitative business practices in order to meet HUD's Section 3 benchmarks. It is better for the Grantee to proactively support and protect people experiencing poverty (even if it means missing the benchmark) than to be implicated in harming the very people that CDBG is meant to support.

GMM References

Chapter 5, Section 5.2 - Overall Procurement Requirements - Section 3 Benchmarks

Chapter 5, Section 5.2 - Overall Procurement Requirements - MBE/WBE

Chapter 5, Section 5.5 - Methods of Procurement

Chapter 5, Section 5.7 - Procurement of Professional Services

Chapter 5, Section 5.9 - Procurement of Construction Services

County of Imperial Seeley Fire Station and Cooling Center, Photo Credits: County of Imperial

Hiring Practices

CDBG grants are meant to invest in the well-being of communities and create economic stability for low-income people and communities. While creating solid programming is the primary focus, there are opportunities to support local low-income folks by leveraging the project to employ and compensate them fairly. In order for CDBG dollars to maximize their impact on low-income communities, the project must:

1. *Employ local people who are low income, and who have experienced the persistent service gaps that CDBG is trying to address*
2. *Compensate and resource these employees so that their economic well-being increases*
3. *Create programs that are responsive to the needs and priorities of low-income communities*

However, challenges to these outcomes abound. Grantees often struggle to attract and hire people from the low-income communities served by their programming, especially people who have experienced persistent service gaps themselves. When they are able to hire such folks, Grantees may struggle to retain them and compensate them fairly so that their economic stability increases. Simultaneously, Grantees with the best of intentions may struggle to create programming that is genuinely responsive not just to the needs but also to the values and priorities of many people within the communities that CDBG is meant to serve.

A Strategic Approach to Hiring Practices

Strategically working to simultaneously expand the pool of potential employees to include low-income community members and attune the programming more closely to the needs of the community makes the Grantee's job easier and aligns CDBG's impact more closely with the intent of the National Objectives.

Overall, Grantees can develop and/or strengthen relationships with low-income communities (moving beyond service provider and service recipient), and then leverage these relationships to identify and attract talented employees while learning what supports these folks might need in order to apply and work sustainably. Then, Grantees must shift their hiring practices so that they attract and recognize the many talents of the people currently being missed in the process. These practices can also be spread outward during the procurement and subrecipient selection processes.

The first table below outlines the goal, the challenges, the overall strategic approaches, and the ways to measure success during the hiring process. This table is followed by three additional tables that take each Strategic Approach and break it down into concrete steps.

A SNAPSHOT: COMMUNITY RESPONSIVE APPROACH TO HIRING PRACTICES			
GOAL	Grantees leverage the hiring process to support low income people and communities while creating programs that are responsive to community needs and priorities.		
	1	**2**	**3**
CHALLENGES	Grantees are unable to attract and hire staff who are low income and have themselves experienced persistent service gaps.	Grantees are unable to retain or adequately compensate and support staff who are low income and who come from the communities being served.	Grantees cannot guarantee that the subcontractors and other businesses they procure are genuinely supporting low income individuals and communities.
ROOT CAUSES	The infrastructure in the recruiting and hiring processes are not built to achieve the goal, regardless of the intention of the people doing the hiring.	Pay scales and other forms of structural support for low income people are insufficient to meet the need and achieve the goal.	Grantees do not have sufficient insight into the labor practices of the businesses they procure or subcontract with.
STRATEGIC APPROACHES	Structure recruitment and hiring policies and practices so that they are better able to attract and recognize talent within low-income communities and successfully hire them.	Create compensation and support systems that distribute resources fairly and create the conditions for all staff to thrive and grow in their roles.	Learn about potential partners' labor practices before entering into contract with them, and conduct Labor Standards assessments in ways that genuinely protect and center the staff.
MEASUREMENTS OF SUCCESS	Grantee staff are increasingly low income and come from the communities being served by CDBG.	Turnover rates drop among staff who are low income and who come from communities served.	Staff are trained in labor practices impacting employees of businesses they contract with as part of program implementation. Grantees systematize and conduct Labor Standards assessments in ways that genuinely protect and center the staff.

Why it Works

Much like in the procurement process, the challenges in hiring practices, as well as the solutions, are interconnected. CDBG regulations are meant to infuse resources into the local community where they are needed most, and in particular support the economic and overall well-being of individuals and communities that are low income and have experienced persistent service gaps.

One of the ways CDBG does this is by prioritizing the hiring of low-income workers in the implementation of their programs, so that the beneficiaries of the federal dollars go beyond the end user (such as the new home owner, community center user) of the program. But employing low-income workers, while a crucial first step in addressing the problem, does not automatically bring people out of poverty and into economic stability. In order for this component of the regulations to have the intended outcome, employment needs to be stable and safe and pay enough/provide room for growth so that people's economic reality can shift upward.

Grantees have direct control over their own hiring processes (both for general employment and for program staff) and can shift these processes so that they better recognize, attract, and resource talent from the low-income communities being served by their programs. Grantees can also leverage the procurement and subrecipient selection processes to spread their influence to these entities.

Shifting hiring practices in these ways can simultaneously increase the pool of potential hires and improve the economic well-being of these community members. These employees, because many of them have themselves experienced persistent service gaps, are the very people who are best positioned to develop community responsive programming.

The three tables below provide concrete steps to take (as well as examples, context, and reflection questions) to address these challenges strategically and reach the overall goal.

HOW TO: DESIGNING HIRING PROCESSES		
Challenge 1: Grantees are unable to attract and hire staff who are low income and have themselves experienced persistent service gaps.		
Strategic Approach 1: Structure recruitment and hiring policies and practices so that they are better able to attract and recognize talent within low income communities and successfully hire them.		
ACTION STEPS	**CONTEXT & EXAMPLES**	**QUESTIONS FOR REFLECTION**
Build relationships with people and organizations in the low-income communities served by your CDBG programming and recruit from within these communities.	▪ The foundation of any hiring process starts with building relationships, which means building time into your process and devoting energy to trust building and transparency about the hiring process and timeline. Design time into the process to accommodate needs and offer flexibility (GMM Ch. 2, 2.2.4).	▪ How are you working to build relationships within the communities served by your CDBG programming that move beyond service provider and receiver?

	▪ Consider instituting an internal referral process, whereby current staff can recommend people they know (who may not find their way to you through traditional recruiting channels) for jobs.	▪ How are you learning about the people you meet in these communities? Learning what they do, what they are interested in, what they prioritize, and how they operate? ▪ What processes do you have in place (or might you develop) to give your staff the opportunity to connect you to people who might be a good fit?
Expand employment opportunity strategies by redefining what makes a good employee, and make hiring materials (from outreach to interview questions) reflective of that definition.	▪ When recruiting, expand the skills section of materials to include skill sets such as multilingual skills, experience receiving support from CDBG programs, experience with persistent service gaps, knowledge that is gleaned outside of school and work, and existing relationships within the communities served by CDBG programs. ▪ Reduce unnecessary requirements such as educational attainment that don't account for alternative ways of learning, and expand your thinking about what a qualified employee looks and sounds like (GMM Ch. 2, 2.2.4). ▪ For example, accept job experience and volunteer/ mutual aid work in place of formal education, and provide special skills training or funds for needed certifications.	▪ Is the skills section of our job descriptions limited or expansive? How might you broaden it to account for the kinds of work and knowledge bases that you need your employees to do but that often either doesn't get done or goes unrecognized as valuable because it is not named explicitly? ▪ Which of your requirements are truly pre-requisites for doing the job well, and which are proxies that may exclude qualified people from applying or being hired? How might you think more broadly about other ways that potential hires can have experience, and what might you be able to teach people on the job?

Remove obstacles and service gaps (surrounding time, money, transportation, technology, required experience, etc.) to the entire hiring process.	▪ Provide private places to fill out job applications, offer computers and Wi-Fi as well as technical support as needed. Should a job site (whether it's your offices or elsewhere) be hard to access with public transit, invest in a shuttle or other transportation offerings to remove travel obstacles. Communicate about these support services in your recruitment materials (GMM Ch. 2, 2.2.4). When possible, allow for remote or off-site work and provide the technology needed to make that possible.	▪ What do you know about the challenges that get in the way of qualified people applying for or receiving an offer of employment? How do you know? Whom have you asked? ▪ How can you adjust your practices and supports available so that these do not get in the way of qualified, talented people getting the job? ▪ How are you effectively communicating what supports are available to folks so that they don't assume they won't be able to apply?

HOW TO: DESIGNING HIRING PROCESSES

Challenge 2: Grantees are unable to retain or adequately compensate and support staff who are low income and who come from the communities being served.

Strategic Approach 2: Create compensation and support systems that distribute resources fairly and create the conditions for all staff to thrive and grow in their roles.

	CONTEXT & EXAMPLES	QUESTIONS FOR REFLECTION
Compensate all forms of labor and account for them when distributing workloads.	▪ In determining pay scales, include increased compensation for all forms of labor and skillsets, including translation and interpretation, relationship development and maintenance, and emotional labor. ▪ Recognize that when an employee benefits their employer via the learnings they hold from lived experience (such as when an employee who has been unsheltered in the past is supporting the development of a program that serves people who are currently unsheltered), it can require significant emotional labor of them (which often requires rest for recovery) and should be compensated as such. (GMM Ch. 2, 2.2.4).	▪ Do your pay scales accurately reflect and reward all of the work that your employees do, or are they limited to only certain kinds of work? ▪ How might you expand your definition of labor when you adjust your pay scales so that they are more accurate? ▪ How are you ensuring that some staff are not doing more work than their peers (without fair compensation) because the extra work that they do (such as translation or community engagement) isn't being classified as additional work?

Meet the language needs of all employees.	▪ Ensure that all signage, such as wage rates, employee rights, and written and verbal communication addresses the language needs of all employees (GMM Ch. 7, 7.5). ▪ If you are hiring people from the low-income communities your CDBG program aims to serve, hiring people who speak languages beyond English will help you tremendously with your outreach, marketing, engagement, and overall relationship-building efforts. Even when these employees also speak English, ask them what language they are most comfortable receiving documentation and communications in, as well as what materials they need in order to do their external engagement in the additional language(s), and then meet that need.	▪ Do you know what language(s) other than English that your staff members speak? ▪ Have you asked them what languages they prefer to receive internal documentation in? ▪ Have you equipped them with the documentation or information they need in order to do community engagement, outreach, relationship development, etc. in these language communities?
Co-design internal structures and systems that support communication and collaboration for all staff, so that everyone can show up fully and authentically as they are.	▪ Co-create community agreements that explicitly state how staff and leadership agree to work together, to navigate conflict, to make space and to take space, to give kind and direct feedback, to make decisions, to make room for emotions that come up in difficult moments, to take care of the self and the collective. ▪ Define professionalism expansively, so that staff are not asked to leave their hearts and their lives at the door, or to separate themselves from their needs, priorities, and values. Make space for these needs, priorities, and values to inform the way the workplace operates, rather than insisting on conformity or uniformity.	▪ What agreements have you explicitly made and that you regularly refer to that ensure everyone is on the same page and can have their needs met in collaborative settings, including when conflict arises and when decisions are being made? ▪ Have you looked at your definition of professionalism to ensure that it allows your staff to show up to work authentically and fully, in the way that is comfortable for them, even if that differs from what is comfortable for leadership?

Provide mentorship opportunities and "grow your own" programs that will support all staff, and especially staff who may be new to working in government or in offices with similar structures and requirements.	▪ Ask employees about their skill-development goals, and design mentorship support systems and professional development plans and budgets around that. When possible, aim to match staff with more experienced staff from similar backgrounds and/or with similar experiences. This will limit the potential for mismatched expectations and miscommunications. ▪ Treat mentorship as bi-directional, as mentors should be open to learning also from mentees. On-board mentors and mentees on community agreements that support communicating openly and safely across power differentials. ▪ Couple this with a grow-your-own program, in which you support staff in entry-level positions to move up the ladder of your organization (GMM Ch. 5, 5.3).	▪ What opportunities and resources have you created to support staff, especially staff who may be new to working in government or in office settings that look like yours? ▪ Does new staff have someone to talk to, to learn from, and to teach? Are these relationships being resourced (in other words, is time and/or money set aside to support these interactions)? ▪ Have you created internal systems so that staff who want to grow and develop in their jobs and roles have the opportunity to do so?
Solicit feedback on how all staff feel in their role.	▪ Ask for feedback from your staff to understand what their experience has been and what they need as support. Ensure that there are structures in place for these staff members to be open and direct without fear of retaliation. There may be dynamics at play for them that are not obvious to leadership.	▪ How do staff feel in their roles? How do you know? ▪ Are you equating silence with contentment? Are you accounting for the fear employees might have in speaking up if things are not going well for them?

HOW TO: DESIGNING HIRING PROCESSES		
Challenge 3: Grantees cannot guarantee that the subcontractors and other businesses they procured are genuinely supporting low income individuals and communities.		
Strategic Approach 3: Learn about potential partners' labor practices before entering into contract with them, and conduct Labor Standards assessments in ways that genuinely protect and center the staff.		
ACTION STEPS	**CONTEXT & EXAMPLES**	**QUESTIONS FOR REFLECTION**
Learn about potential partners' hiring practices when developing relationships with local businesses and when procuring contractors and selecting subrecipients.	▪ Consider relationship building to be a holistic exercise. Do not focus on outcomes or value add, really focus on getting to know the folks you may be working with. Get to know the staff, not just the leadership. Get curious about how things work, why they work that way, and what resources could help things work better. Notice who is hired, how they are treated and compensated, how they are (or are not) given space to grow in their roles. Learn about working relationships. Notice staff turnover. When you can, talk to people about why they work there and what they do or do not like about it; and talk to people who leave their jobs about why they did so. ▪ Sometimes businesses pay their employees low wages because it's all they can afford, and an infusion of additional resources would be directed towards employees. Sometimes, businesses pocket profits solely at the leadership level.	▪ What do you know about the businesses in your community and how do you know it? ▪ Are they hiring and supporting their low-income employees in ways that allow them to live their lives with economic security? Are these folks being compensated for all of the work that they do? Would an infusion of federal dollars be put towards improving their lives? Or would it be kept out of their hands? ▪ When you get to know businesses, are you getting to know the staff too to have a better understanding of how the business operates and how employees are treated and compensated?
Build your hiring expectations into the procurement and subrecipient selection processes.	▪ When writing RFP/RFQs, be explicit about the expectations for how employees are hired, treated, and compensated. (See Challenge 1 and 2 tables for these best practices.)	▪ Are you holding yourselves accountable for the hiring practices of the people and businesses you partner with?

	▪ Be mindful of adding specific qualifications that may limit your pool of bidders or make the bidding process onerous for small businesses. Be flexible in how they show you what they do for their employees. Also, give them the option to tell you how the infusion of federal dollars will be spent in support of low-income employees. ▪ Build the opportunity for businesses to acquire additional points in the bid evaluation process based on hiring practices that support low-income individuals.	▪ How are you ensuring that the funding you are providing is supporting the lives and livelihood of low-income people who are working on this project? ▪ Have you adjusted your procurement and subrecipient selection processes to reflect this priority?
When conducting interviews with employees regarding compliance, be mindful that the responsibility to protect an employee should be proportionate to the potential for exploitation.	▪ Employees who are low income, gig workers, not members of labor unions, or who have themselves experienced persistent service gaps, among others, are at greater risk of exploitation. Therefore, efforts to protect them must reflect this greater risk. ▪ Avoid potential risks for retaliation. For example, when monitoring worksites, interview employees without their supervisor present, and interview multiple employees in one stint so that general information is less likely to be traceable back to any individual. (GMM Ch. 7, 7.7). ▪ Warn against and monitor for retaliation, when reports (such as for a misclassified employee) must include identifying information.	▪ How are you doing compliance checks in ways that protect workers who do not work directly for you? How are you creating safety in these processes? ▪ Are you triaging your compliance checks according to the risk of exploitation, both by monitoring more closely and by putting more safeguards into your compliance systems?

Ensure that all partners are providing information, especially information about their rights and the protections available to them, in the languages they read and/or speak.	▪ Compliance processes are required by the regulations in order to protect employees. But these processes only work if they are communicated in ways that the employees can understand them. Ensure that all signage, such as wage rates, employee rights, and written and verbal communication addresses are written and otherwise delivered in the languages spoken and understood by each employee (GMM Ch. 7, 7.5). When conducting labor compliance interviews, ask how the worker wants to be interviewed. If it's in person, conduct it in their preferred language. If it's via mail, provide the survey in their preferred language (GMM Ch. 7).	▪ Do your partners have all the necessary materials in the languages spoken by their employees in order to ensure that their staff knows their rights? ▪ Are there materials that you can provide them to support these employees? If you don't have them on hand, have you considered who else you can ask (such as HCD, other Grantees, or your GA)? ▪ Do you have staff members who are able to speak languages in addition to English so that you are able to ensure the safety of all workers?

Subrecipient Selection

CDBG grants are meant to invest in the well-being of communities and create economic stability for low-income people and communities. Grantees have the responsibility to the end users of programming as well as to the taxpayers who fund these programs to ensure that the entity implementing the program has the capacity to design and implement programs in a community responsive way. In order to do that, the Grantee must:

1. *Determine who has the most capacity to design and implement the program, and if that is an organization beyond the Grantee itself, to sign a subrecipient agreement so that the program is created and implemented successfully.*

2. *Ensure that they are partnering with subrecipients who both (a) have capacity, and (b) are driven and trusted by the low-income community members being served.*

3. *Ensure that the programs created and implemented by these subrecipients are responsive to the needs and priorities of the people living in these low-income communities.*

Sometimes, the Grantee is best positioned to implement a program. However, when Grantees do not have the internal capacity to do this work, they may find themselves facing challenges to partnering with Community-Based Organizations (CBOs) that match this description. Many communities have CBOs who do community responsive work and are led and trusted by the low-income community members being served. However, these organizations often do not have long-term, trusting relationships with government, and they are often under-resourced, meaning that government pay structures may be difficult for them to shoulder. The CBOs who do have relationships with government often have more resources, but are not led or trusted by the communities being served, and they often struggle to create programming that is responsive to the needs, priorities, and values of these communities. This conundrum results in both a lack of community responsive programming and a missed opportunity to put dollars in the hands of low-income people in the implementation process.

A Strategic Approach to Subrecipient Selection

Strategically working to expand the pool of potential subrecipients to include CBOs that are led and trusted by low-income community members and to attune the programming more closely to the needs of the community both makes the subrecipient selection process easier for the Grantee and aligns CDBG's impact more closely with the intent of the National Objectives.

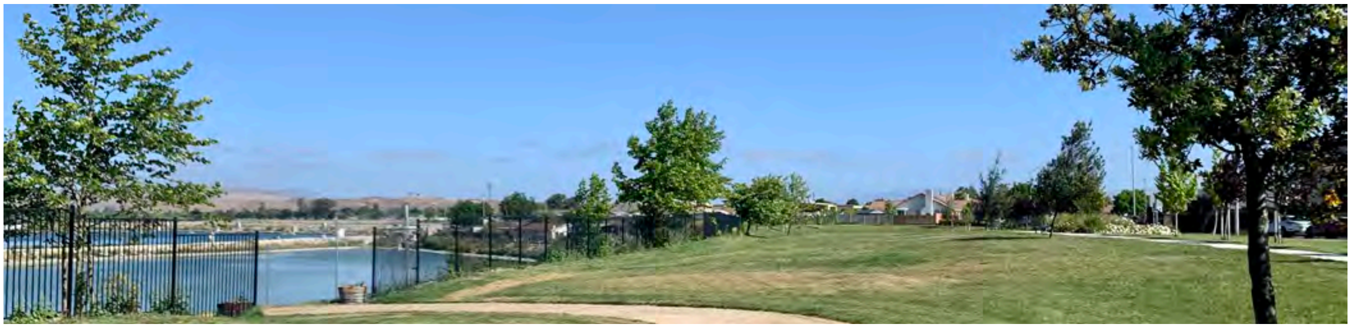
Grantees can start by developing and/or strengthening relationships with low-income communities and leveraging these relationships to identify and build relationships with the CBOs they know and trust. They can get creative in how they fund these CBOs to account for resource imbalances. They can also work with current partners to do more community responsiveness, or, if that is not possible, they can dissolve these relationships.

The first table below outlines the goal, the challenges, the overall strategic approaches, and the ways to measure success during the subrecipient selection and monitoring process.

This table is followed by three additional tables that take each Strategic Approach and break it down into concrete steps.

A SNAPSHOT: COMMUNITY RESPONSIVE APPROACH TO SUBRECIPIENT SELECTION			
GOAL	Grantees are able to reliably identify and partner with CBOs who do community responsive work and who are led and employed by the people being served by CDBG programming, thereby leveraging the process to doubly infuse federal dollars into low income communities.		
	1	**2**	**3**
CHALLENGES	Grantees often do not have prior partnerships or strong relationships with CBOs that are built, run, and trusted by the low income people being served by CDBG programs.	CBOs that are built, run, and trusted by the low income people being served by CDBG programs often have fewer resources and may need different supports than the CBOs a Grantee is familiar partnering with.	Grantees often continue prior partnerships with CBOs that have political influence and robust infrastructure but are not built, run, or trusted by the communities being served do not do community responsive work.
ROOT CAUSES	Authentic, trusting, relationships are built over time, with multiple, deep interactions in various settings, including thought partnering and reciprocal support. Such interactions between government representatives and people from low income communities are rare, and often limited to imbalanced interactions, such as between service provider and service recipient.	These CBOs often have less presence and visibility in decision making spaces and are less likely to have resources directed their way. Because they center low income community members (rather than donors) in their internal decision making, they may have less access to donations as well.	Partnerships are often formed from pre existing relationships, which is often with people who trust, are trusted by, and have experience working alongside government. These are often not the CBOs built, run, and trusted by low income community members.
STRATEGIC APPROACHES	Seek out and develop and maintain relationships with CBOs that do community responsive work and that are trusted by, employ and fairly compensate, and are led by people from the community being served by the CDBG program.	Provide the necessary support that community responsive CBOs may need due to lack of prior and reliable investment in the work that they do.	Identify CBOs not conducting community responsive work, who are not centering people from the community being served in decision making positions, and either discontinue relationships or invest in building their capacity to shift their practices toward community responsiveness.

MEASUREMENTS OF SUCCESS	Grantees develop formal and informal relationships with CBOs and community based leaders engaging in community responsive efforts in communities most impacted by persistent services gaps.	Grantees closely collaborate and contract with CBOs and community based leaders engaging in community responsive efforts to augment their resources.	Grantees have a tailored pool of CBOs to contract with that includes CBOs and community based leaders engaging in community responsive efforts.



City of Hollister San Benito River Park Project, Photo Credits: City of Hollister

Why it Works

In addition to creating programs that are responsive to the needs and priorities of low-income communities, CDBG regulations are meant to infuse resources into the local community where they can do the most good. Sometimes this involves a Grantee naming a subrecipient who is better positioned to implement the CDBG program. The regulations say that the subrecipient is subject to the same requirements that the Grantee would be subjected to if they were driving implementation, and indeed they are being entrusted with meeting the National Objectives. The Grantee's responsibility is to both support the subrecipient and hold them accountable to the regulations and the intent of the National Objectives.

The strategies listed above are responsive to the National Objectives and to the role of the Grantee. As has been named in 3.2 and 3.3, the most effective way to use CDBG dollars is to employ people who are low income and are members of the community being served. This will both ensure that programming is community responsive and that as many dollars as possible are being put in the pockets of low-income community members. The strategies in 3.4 demonstrate how the Grantee can honor these responsibilities even when they themselves are not doing the implementation.

Relationship-building with the community members being served is a throughline in this Toolkit, because all community responsive work begins with relationships and trust: Trusting that low-income community members themselves are best positioned to know what they need. The Grantee's job is to push resources towards that trust. When the government trusts communities with resources, change happens, the government's job gets easier, and greater economic stability and overall well-being follow.

The three tables below provide concrete steps to take (as well as examples, context, and reflection questions) to address these challenges strategically and reach the overall goal.

HOW TO: DESIGNING SUBRECIPIENT SELECTION PROCESSES

Challenge 1: Grantees often do not have prior partnerships or strong relationships with CBOs that are built, run, and trusted by the low income people being served by CDBG programs.

Strategic Approach 1: Seek out and develop and maintain relationships with CBOs that do community responsive work and that are trusted by, and employ and fairly compensate, and are led by people from the community being served by the CDBG program.

ACTION STEPS	CONTEXT & EXAMPLES	QUESTIONS FOR REFLECTION
Seek out the best CBOs from the end-user perspective.	▪ The ideal partner for a CDBG project is one that is built, run, and trusted by the community being served by the CDBG program. These CBOs give the Grantee the opportunity to maximize the impact of their federal funding by creating programs that are aligned with the values, needs, and priorities of the people being served, while providing income to the low-income people who will be implementing the program. ▪ Do not assume that you know these CBOs. Often the CBOs with the most visibility are simply the most resourced. Learn who these CBOs are by visiting community hubs such as a store, restaurant or park that is in the community being served, talk to service recipients, and ask around about CBOs folks trust and recommend. (You may have employees who are from the communities served. Offer opportunities for information sharing and for warm handoffs, but be mindful that this is likely an additional form of labor you are asking of them beyond their job description. Never require any employee to give this feedback, ensure that they are compensated for any expertise they bring (See App. B, Spotlight, p.24), and do not treat their perspective as representative of an entire community.)	▪ Is this CBO trusted by the people in your community who experience persistent service gaps? ▪ Does this CBO do community responsive work that is aligned with the needs, priorities, and values of the low-income communities that CDBG aims to serve? How do you know? ▪ Have you created opportunities for community members to share their honest opinions with you in neutral spaces (e.g., not in the middle of service provision when gratitude is often an expectation)?

Seek out CBOs that are led, built, and staffed by the low-income community members who are served by the CBO and by CDBG. Look for CBOs who treat and compensate their employees well, and who center people with lived experience in decision-making processes.	▪ There are many CBOs that hire front-facing staff members who are from the communities being served, but keep these employees in low-paying jobs and out of decision-making spaces, while the leadership brings home middle class or higher salaries. ▪ Such a structure goes against the purpose of CDBG, which is to meaningfully improve the lives of low-income communities and allow for self- and community-determination. ▪ Ask potential partners about their hiring, retention, compensation, and internal growth policies and practices. Talk to their staff. Talk to the people who seek services there.	▪ What is the leadership structure of this CBO? ▪ How are decisions made? By whom are they made? ▪ Are staff from communities served compensated fairly and in decision-making positions? ▪ In other words, are the hiring practices aligned with the intended impact of CDBG?
Understand that CBOs that have not partnered with government before may not trust government entities any more than their constituents do. Treat this distrust with respect, and work to build trust over time by walking the walk.	▪ Create space for relationship and trust building. Start each meeting with some time to get to know each other personally before jumping into business. Prioritize the relationship over an arbitrarily urgent timeline by being as flexible as possible, and communicating why when you are not able to be flexible. Communicate transparently about what is, and is not possible, within the structure of the program. ▪ Answer questions that are asked, even when those questions are asked with skepticism.	▪ How are you ensuring that you are building relationships that are not transactional, but truly reciprocal? ▪ What structural ways are you putting relationship and support before the urgency of deadlines? When potential partners tell you that you are moving too quickly (e.g., quicker than the speed of trust), do you slow to meet the pace that feels comfortable for them? ▪ Are you truly listening and genuinely working to meet the needs of a new partner? Are you aware of which deadlines/regulations are fixed and which can be adjusted to meet this need?

HOW TO: DESIGNING SUBRECIPIENT SELECTION PROCESSES		
Challenge 2: CBOs that are built, run, and trusted by the low income people being served by CDBG programs often have fewer resources and may need different supports than the CBOs a Grantee is familiar partnering with.		
Strategic Approach 2: Provide the necessary support that community responsive CBOs may need due to lack of prior and reliable investment in the work that they do.		
ACTION STEPS	**CONTEXT & EXAMPLES**	**QUESTIONS FOR REFLECTION**
Contract, and leverage funds, in creative ways that allow under-resourced CBOs to participate.	▪ Create systems to allow for consistent payments every 30 days, recognizing that it is a significant burden to expect under-resourced CBOs to have 90 days of capital available before reimbursement. You can do this by using general funds, lines of credit, or other alternate funding sources to pay them promptly while you are still awaiting funds from HCD. ▪ As much as possible, allow funds to be spent on internal capacity building so that the staff who do the external work are supported. ▪ Minimize complex reporting requirements.	▪ What funding mechanisms do you have access to that can allow you to speed up your reimbursement/payment schedules with businesses that do not have the reserves to wait a full 90 days? ▪ How flexible can you be in your funding terms so that businesses can spend the funds in a way that is most beneficial to their staff and to the implementation of the program, given capacity? ▪ Have you put a critical lens on your reporting requirements to ensure that you are limiting them to what is truly necessary and allowing for flexible and less onerous reports?
Help CBOs that have not partnered with the government to learn the system, and have the system learn from them.	▪ Remember that the way government operates is not necessarily intuitive. Government funding systems are based on a set of assumptions, rules, and procedures that may be very familiar to you and be foreign and not obvious to a business that hasn't engaged with government before.	▪ What supports are being offered to folks who might be new to partnering with government? ▪ Are you both anticipating the questions and needs that businesses might have AND asking folks to share with you the needs and questions that they have? ▪ Simultaneously, are you also asking for feedback from them on where the policies you have in place could shift to better support them?

	▪ Ask if the CBO needs support completing documentation or other requirements to be considered as a subrecipient. Ensure that you are prepared to offer support being sought and to get creative when a requested support is unavailable. Asking without being able to follow through will damage the relationship. ▪ Support might include financially supporting the staff time it takes to gather documents and data needed or providing technical assistance (GMM Ch. 11, 11.1). ▪ When this feedback loop points you to ways in which the system could better support under-resourced CBOs, work internally to make these adjustments structurally.	▪ And finally, are you shifting where you can based on their feedback?
Ask for feedback from CBOs that don't participate, and honor it by making shifts.	▪ If a trusted CBO declines the invitation to apply as a subrecipient, ask if they would be willing to provide feedback as to why. This can illuminate what obstacles under-resourced CBOs face, so you can work to eliminate those for future projects. This learning can also illuminate areas where the priorities and values of the CBO and community served may not be aligned with the government or CDBG project. Take this feedback to heart, and work to align more closely with the priorities of the community being served. ▪ Be mindful that if you receive feedback but make no adjustments, this can erode trust. ▪ Communicate identified challenges to HCD to promote larger systems change. ▪ If a CBO doesn't want to provide feedback, don't make assumptions about why, as it may indicate lack of time/bandwidth and/or lack of relationship. Instead, keep investing in the relationship.	▪ Are you demonstrating curiosity and authentic relationship building by continuing conversations with organizations that do not want to work with you at this time, by asking them if they are willing to share direct and honest feedback with you, and making shifts to your systems based on that? ▪ Or are you ending conversations and writing these relationships off as dead in the water?

HOW TO: DESIGNING SUBRECIPIENT SELECTION PROCESSES		
Challenge 3: Grantees often continue prior partnerships with CBOs that have political influence and robust infrastructure but are not built, run, or trusted by the communities being served do not do community responsive work.		
Strategic Approach 3: Identify CBOs not conducting community responsive work, who are not centering people from the community being served in decision making positions, and either discontinue relationships or invest in building their capacity to shift their practices toward community responsiveness.		
ACTION STEPS	**CONTEXT & EXAMPLES**	**QUESTIONS FOR REFLECTION**
Put a critical lens on current partnerships. Identify why they are in existence, and whether continuing to partner with these CBOs is in the best interest of the end-users of the programs and of low-income community members?	▪ Government partnerships with CBOs come about in a variety of ways: they may be the result of prior relationships that CBO leadership has with government representatives; a CBO's practices might mirror government practices; and/or the CBO may deliver their messaging in ways that are received well by donors and politicians. ▪ However, these are often not the same CBOs as those created by the people in low-income communities to support their own community. Such CBOs often have fewer resources, and fewer relationships with people who have the power to decide where funding goes. They may have different ways of framing and/or approaching challenges, and outside-of-the-box or nuanced approaches to fixing the problems that may be difficult for government officials to understand because they are simply different from how it has been done before.	▪ Why are your current partnerships in place? Is it because they are led by people who hold influence with and have trusted relationships and perhaps even friendships with people within government? This is, of course, not inherently a problem, but it does require further inquiry: Do these CBOs also have similar alignment and relationships with the community being served? How do you know?
When you are in relationship with CBOs who are not fully aligned with the communities they serve, encourage them to shift their practices. Resource these practices where possible as a form of support to CBOs.	▪ Sometimes, these are the only CBOs available or interested in implementing the project.	▪ When a CBO you often partner with is out of alignment with the community they serve (especially when this is the only CBO in town or the only one interested in administering the CDBG program) can you find ways (and possibly funds) to help them shift their practices towards community responsiveness?

	▪ Regardless, it is in the best interest of everyone involved if these CBOs shift towards more community responsive work and hire, empower, and fairly compensate more people from the low-income communities being served. ▪ Leverage relationships to point these organizations towards best practices (such as the practices in this Toolkit around hiring, engagement, etc.). When possible, and when needed, provide support to CBOs to embed these learnings.	
Dissolve relationships when necessary.	▪ Sometimes, a CBO, the leadership, and/or their donors, are committed to maintaining the status quo and resistant to the idea that this status quo is actually not in the best interest of the community being served. ▪ While it is always a good idea to offer support and ask folks to look honestly at their systems and shift, change will only come when there is internal willingness to make it at the leadership level. ▪ In such cases, dissolving the professional partnership may be necessary, at least for the time being, in the interest of the community and the intent and successful implementation of CDBG.	▪ Is this CBO willing/able to make shifts towards community responsiveness? To engage their low-income staff members in decision-making practices? ▪ When is it time to dissolve the partnership?

Spotlight: Partnering with Embedded CBOs

"[Our] County's CDBG programs/projects are designed to meet the needs of our [whole] community, providing sustainability, improving lives, addressing homelessness, curing health/safety issues, and building additional housing. The County recognizes that we do not have the capacity to meet all [the layers of need] that may exist within the community, so we are partnering with nonprofits who already [address specific] community [needs]. These partnerships extend the community outreach and services to those most impacted, thereby providing a more... transformable impact on the community, the low-income, aging, disabled, vulnerable, homeless, and veterans."
— 2022 Community Priorities Survey

GMM References

Chapter 11, Section 11.1 - Monitoring

City of Grass Valley Memorial Park, Photo Credit: Tristan Moore

PART IV: PROGRAM DESIGN

Introduction to Community Responsive Program Design

CDBG is designed to create the conditions for self- and community-determination, by distributing resources based on need and infusing those resources into programs designed to account for community priorities.

In order to do this, Grantees must

1. *Understand community priorities and needs*
2. *Design programs that are responsive to these needs, and*
3. *Ensure that these programs are realistically implementable within the local context.*

Part 4 is organized slightly differently from the rest of the Toolkit due to the nature of program design. 4.2 looks at the various kinds of programs that are eligible for CDBG funding. For Grantees who are creating economic development programs, for example, you may want to look at the overview table towards the beginning of 4.2 to better understand the overall challenges and goals, and then skip to the implementation table that gives concrete steps for how to apply this framework to economic development programs.

Program Specific Considerations

CDBG grants are meant to create economic stability for low-income people and communities that have experienced persistent service gaps and disinvestment. In order for that to happen, program design must:

1. *Account for and be driven by community priorities and values*
2. *Account for all of the realities of the local context*
3. *Be invested meaningfully in the local low-income community at every step.*

But frequent challenges to this arise. Government agencies create the parameters that determine how funds may be spent and how much communities will receive. Some of these parameters are unchangeable (for example, because they are due to federal regulations). But some are also based on missteps in the program design process. Grantees are often understaffed and may struggle to do the robust engagement required to fully understand all of the layers of community priorities and/or to account for all of the logistical context that may undermine the value of the program. When it comes to designing programs for low-income communities who have experienced persistent service gaps and disinvestment, government agencies must ensure that the expertise of people from low-income communities is centered in program design from beginning to end.

A Strategic Approach to Program Design

Designing programs that fully account for local logistical context and with the stated priorities and values of low-income communities can ensure that CDBG programs are best aligned with the National Objectives while simultaneously easing the process of program implementation.

The table below outlines the challenges associated with designing each of the four program types (housing, economic development, public facilities, and public services). Following this table, you will find that each program type has its own implementation table, with concrete steps to take in order to ensure that your program is responsive to your local context and to the needs and priorities of the low-income communities you are serving.

A SNAPSHOT: COMMUNITY RESPONSIVE APPROACH TO PROGRAM DESIGN				
GOAL	Grantees design and implement programs that create the conditions for economic and overall well being, preserve dignity, and are rooted in self- and community-determination.			
ELIGIBLE PROGRAM TYPES	**HOUSING**	**ECONOMIC DEVELOPMENT**	**PUBLIC FACILITIES, INFRASTRUCTURE & IMPROVEMENTS**	**PUBLIC SERVICES**
CHALLENGES	Programs funded are not meaningfully responding to the needs, priorities, and desires of the community members served by local governments nor to the realities on ground.	Local businesses that are owned and staffed by low income community members may be displaced, while businesses with more resources (but that are not built by the low income community) benefit.	Grantees struggle to create Public Facilities programs that are community responsive and mitigate harm to low income residents.	Services offered may not be responsive to the priorities of low income community members, and/ or they may be structurally, practically, or geographically inaccessible.
ROOT CAUSES	Housing programs are developed without sufficient engagement to understand the nuances of the needs or obstacles on the ground, and community members are not aware of the supports available to them.	Businesses that are locally owned, staffed, and trusted by low income community members may not have the capacity that larger, better resourced businesses do to navigate these programs, and they do not receive the support that they need.	Low-income community members are often not engaged as co designers, and their wisdom regarding their priorities and also the limitations or harm that the program may create are not baked into program design.	Currently existing mutual aid services within communities are not on Grantees' radar and don't receive investment, and outside service providers do not have the context that they need to do community responsive work.

STRATEGIC APPROACHES	Meaningfully engage with communities who are most impacted by persistent service gaps to understand what sort of housing assistance would benefit them most, design programs that align with this and with the reality on the ground, and ensure that community members know what support is available to them.	Meaningfully engage with people who are most impacted by persistent service gaps about the businesses that are missing from their community or are underresourced. Use this learning to inform decisions about economic development that will serve, rather than harm and/or displace, these community members.	Design and implement these programs in a way that responds to the stated needs of the low income community, and integrate mitigation strategies to prevent displacement of current residents.	Understand and empower a community to decide what services their neighborhood needs based on values and priorities shared by the community itself.
MEASUREMENTS OF SUCCESS	Communities most impacted by persistent service gaps indicate that housing assistance programs meaningfully meet their needs, priorities, and desires, and that they are fully supported to overcome obstacles to participation.	Local businesses that are owned and staffed by low income community members are supported to enter into economic development programs, rates of displacement of existing businesses are lowered.	Communities most impacted by persistent service gaps are meaningfully engaged as co designers, (e.g., a community advisory committee is formed; their feedback is integrated; and program outcomes reflect their feedback.	Community driven mutual aid services are funded and supported.

The following subsections provide four tables that offer concrete steps to take (as well as examples, context, and reflection questions) to address these challenges strategically and reach the overall goal within the context of your specific program type.

Housing Programs

Housing programs that are eligible for CDBG funding include funding the purchase (under certain conditions) or rehabilitation of a home that will be occupied either exclusively (in the instance of single-family homes) or primarily (in the instance of properties with multiple units) by low-income households. Funds can be provided in the form of grants or loans (forgivable, deferred, or amortizing). Applicants are eligible based on household income, and the program must ensure that program guidelines do not discriminate amongst applicants. For any housing project that results in displacement, temporary or permanent, tenants are always covered by the URA (see Appendix B, Section 4.3, GMM Chapter 9), while homeowners may be eligible for relocation payments under certain circumstances (GMM Chapter 9).

In order to ensure that housing programs are maximizing their impact on the low-income community members who are the intended recipients of CDBG funding, the project must:

1. *Be responsive to the values, priorities, needs, and experiences of the low-income community members CDBG is intended to reach*
2. *Account for and respond to the local context (economic, neighborhood layout, etc.)*
3. *Be implemented in ways that are supported, relational, and flexible, so that all participants have meaningful access and their dignity remains intact.*

Designing a community responsive housing program begins with meaningful engagement of the people who are most impacted by persistent service gaps to understand what sort of housing assistance would benefit them the most (see Appendix B, Section 2.2). The second component is about ensuring that these community members know what is available to them (see Appendix B, Section 2.3). It cannot be overstated the extent to which the relationships developed (or not) during the engagement and outreach process will have a direct connection to the success (or failure, or imbalanced impact) of the program itself. Leaning into these relationships and maintaining ongoing feedback loops will allow the Grantee the opportunity to get folks into the program and support them as they navigate what is often a long and arduous process and minimize the burden placed on them. To this last point, community-responsive housing programs go beyond affordability. Housing is personal, and contracting is complicated and stressful. Providing wraparound, start-to-finish support (including emotional) is as important as preserving people's agency and dignity, by listening to and championing their priorities, rather than treating them as if the government knows better about what is good for them.

NOTE: If relocation is a part of the rehabilitation project, refer to the strategic approaches in Appendix B, Section 4.3 - Cross-Programmatic Considerations.

Spotlight: So Much Funding, So Little Housing

A Grantee explained the obstacles and challenges they were experiencing in their community as they struggled to usher residents into their first homes. While the program seemed to align with community priorities and values, there was a mismatch between the program design and the logistical realities on the ground.

"Currently we feel our community is having a great impact with procurement pertaining to first time homebuyers' assistance programs, we have applicants pre-approved but no homes that are in their approval range." — 2022 Community Priorities Survey

HOW TO: DESIGNING HOUSING PROGRAMS		
Challenge: Programs funded are not meaningfully responding to the needs, priorities, and desires of the community members served by local governments nor to the realities on ground.		
Strategic Approach: Meaningfully engage with communities who are most impacted by persistent service gaps to understand what sort of housing assistance would benefit them most, design programs that align with this and with the reality on the ground, and ensure that community members know what support is available to them.		
ACTION STEPS	**CONTEXT & EXAMPLES**	**QUESTIONS FOR REFLECTION**
Ensure that engagement through a framework of community responsiveness has driven the program design.	▪ Insights learned from relationships with low-income community members, Community-Based Organizations (CBOs) and leaders, have directly informed program design. For example, Grantees account for the anxiety that a GIN notice can create, and actively support residents who are tempted to move before the ION processes, which can prevent them from receiving the federal funds they are otherwise entitled to (GMM Ch. 9, 9.3).	▪ Have you built meaningful relationships with the low-income communities you are working with? ▪ Have you asked for their input on your program design (before the program is fully baked), and followed through to implement their recommendations? ▪ Do you have feedback loops built throughout the entire program design, implementation, and evaluation process?
Do due diligence ahead of time about the feasibility of your program that includes context that may not be known or accounted for by community members. Overlay this information with what you learn from community engagement.	▪ Learn about the current housing market. Make sure, for example, that you are designing a lending program that is aligned with the cost and availability of local housing. When you overlay this information with the information you get via engagement, make sure that the housing available in neighborhoods where people feel a sense of community are going to work within the context of your lending program.	▪ Does your program account for the layers of context on the ground in your community? ▪ Have you overlaid the priorities that you are hearing about from low-income community members with these additional points of context to make sure that your program is feasible?

Continue to nurture the relationships built during the initial engagement process	▪ Nurture relationships with community-based leaders. They may be the most trusted sources of information when providing services to low-income community members who, because of a history of mistreatment, may feel unsafe and distrust the government. ▪ Check in with these essential community partners, and take the feedback they provide as valuable data that is used to make meaningful changes to your processes. Communicate clearly and transparently when changes are not possible. ▪ Advisory services during the URA Relocation process, for example, should be promoted through these relationships so that all residents, regardless of their trust in or relationship with the government, understand that these services are available to them. (GMM Ch. 9, 9.2)	▪ When stewarding relationships, do you maintain consistent communication throughout? ▪ Do you continue to solicit feedback from these relationships, and follow through on insights learned? Are you communicating transparently about why you can't when you can't? ▪ Have you created a way to compensate people when they help you do outreach (See App. B, Spotlight p.36)?
Be proactive in letting folks know that the government wants them in this program.	▪ Communicate directly to specific communities you want to engage in your program instead of generalizing about 'the community.' This could look like investing in relationships with CBOs that are driven and trusted by low-income community members, customizing your communications, working to understand nuances in community needs, and proactively communicating about available supports and accommodations.	▪ Are you proactively speaking to the various low-income communities in your area to ensure that they know about the program and understand that they are welcome and encouraged to apply? ▪ Are you showing you want folks in your program by how you design programs, engage, market, and hire?

Offer continuous wraparound support for participants, including emotional support. Housing is personal, and rehab projects are stressful, even more so when you are not entirely in control.	▪ Homes are very personal parts of our identity and are foundational to our sense of safety. Homes are where we care for children, care for our elderly relatives, recover, play and/or work, so disruptions, such as inviting strangers in, can be difficult. Ask folks whether there are days or times when work would be least disruptive, for example if someone works a night shift, construction during the day makes it impossible to rest for their job.	▪ Have you asked folks most affected by a housing project if there are ways you can minimize the negative impact and stress that it can create? ▪ Have you offered flexibility in the timing of your work to decrease disruption? ▪ Have you offered alternative support, like childcare, if your work prevents a resident from being able to keep their child safe?
Listen to, believe, and champion the priorities of the homeowner or resident.	▪ When helping someone impacted, ask what their priorities are, and then support them in meeting these priorities. For example, what they value most in rehabilitating their home or purchasing a new one may very likely be different from what you think they might or should want. Don't make assumptions. Ask first (GMM Ch. 8, 8.8).	▪ Have you built a relationship with the folks being impacted? ▪ Have you asked about their priorities in the rehab process and trusted them to know themselves best? ▪ Are you designing the program to allow for flexibility in order to implement the recipient's priorities?
Take a community responsive approach to eligibility and support.	▪ Be mindful of the fact that to this day, traditional, fixed, government-backed loans are not equally available to everyone. Similar limitations apply to the rental market: people with vouchers, single parents, and people without significant credit histories are offered limited housing and lending options. CDBG has an opportunity to be a part of the solution. ▪ Reach out proactively to community members and trusted partners to signal safety and offer wraparound support to get folks who have not been served well by current systems into your programs.	▪ Are you considering the communities experiencing gaps in distribution of credit (and other housing considerations) when designing your housing program? ▪ Are you infusing this knowledge into outreach, support, and communication plans? ▪ Are you ensuring that you keep people, especially people who are most vulnerable to financial and housing systems, in their homes at all costs?

	▪ Be transparent and available. And when housing support comes in the forms of loans, never remove someone from their home for lack of ability to pay. Foreclosure and/or eviction is catastrophic for families. The terms of the loan can include forgiveness. That is a lever to be used.	
Prioritize the financial stability of the people you are funding.	▪ Don't use amortizing loans when forgivable loans are what people need in order to thrive. (For example: Offer loan forgiveness after 5 years or upon death of the title holder).	▪ Are you prioritizing the financial health and stability of the people you are funding over the banks?

Why it Works

People are experts on their own priorities and values. There is no right way to want to live. There is no correct neighborhood or proper evaluation of a home (beyond safety, of course). There is only the truth of what speaks to people, how they envision living their lives in this home, in this community. Centering this information in program design will improve program participation and support the overall well-being of low-income community members.

But wanting to participate in a program is only a piece of it. People in low-income communities are often overburdened with responsibilities and under-resourced to address these responsibilities. Offering wraparound support and ensuring that the process works within their context and within the broader realities on the ground will support Grantees to actually complete these projects with greater regularity and success.

GMM References

Chapter 2, Section 2.5.4 - Eligible Activities

Chapter 8, Section 8.2 - Voluntary Acquisitions

Chapter 8, Section 8.3 - Involuntary Acquisitions

Chapter 8, Section 8.7 - Appraisals and Just Compensation

Chapter 8, Section 8.8 - Section 104(d) One-for-One Unit Replacement (Project Requirements)

Chapter 9, Section 9.2 - General Relocation Requirements under URA

Chapter 9, Section 9.3 - Residential Relocation under URA

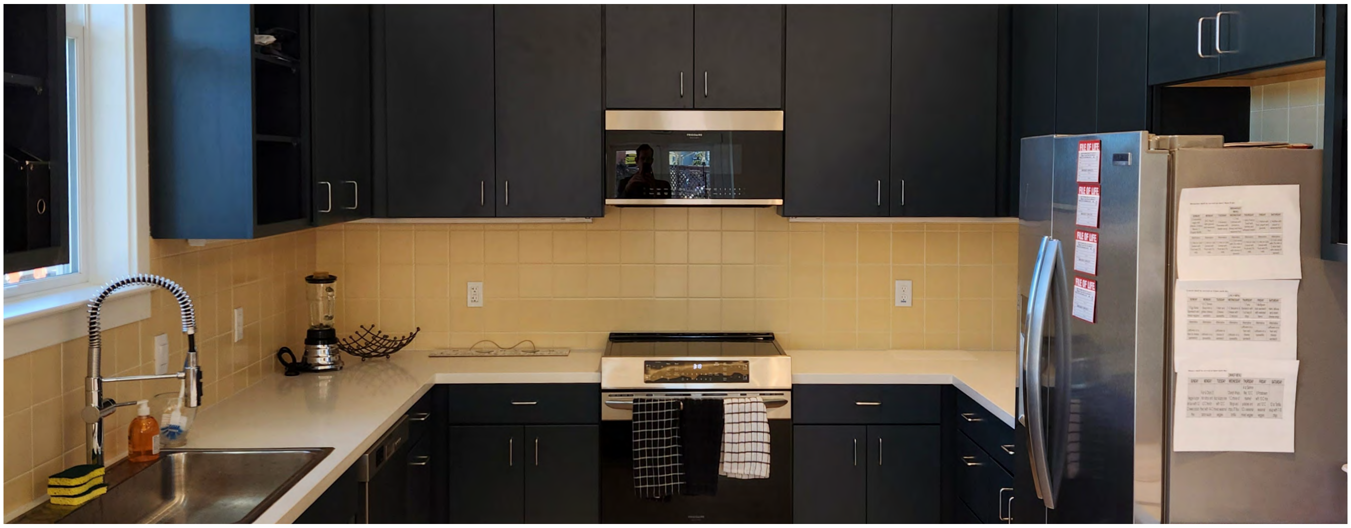
Economic Development Programs

Economic development programs that are eligible for CDBG funding can include activities such as providing direct financial and technical assistance to businesses (for profit and non-profit), assistance to microenterprises, commercial rehabilitation or expansion, which often result in jobs for low-income people. Additionally, economic opportunities can also be generated through CDBG-funded public facilities and improvements, public services, and planning projects that are meant to provide benefits to low-income residents (GMM Appendix D).

In order to ensure that economic development programs are maximizing their impact on the low-income community members who are the intended recipients of CDBG funding, the project must:

1. *Infuse resources into businesses that are aligned with and responsive to the values, priorities, needs, and realities of the low-income community members CDBG is intended to reach.*
2. *Support people who are low income in ways that lead to greater economic stability and overall well-being.*
3. *Improve the lives of current residents of the neighborhood without creating the conditions that lead to displacement.*

A community responsive economic development program centers not just the economic needs, but all of the priorities of the community members who are most impacted by persistent service gaps. It requires thinking about more than just numbers of jobs created. In order to do this well, the CDBG program should prioritize thriving wages, community-centered hiring policies, and the fit of the business with the needs, skills, and priorities of the low-income communities being served. It requires mitigating the burdens required to participate in these programs and proactively marketing to low-income communities so that the benefit does not fall to the well-resourced and connected at the expense of everyone else. It requires thinking past the project itself and anticipating harmful unintended consequences, such as economic displacement.



City of Fort Bragg Parents and Friends Senior Living Facility, Photo Credit: City of Fort Bragg

Challenge Spotlight: The Case Navigator Model

The Grantee is responsible for a lot of bureaucracy and has the responsibility to prevent passing that burden along to the end-user and to make it as easy as possible for them to participate in the program.

One consultant working with HCD on policy reflected: "I think we need to change the model from (1) I put out a program, (2) people apply, (3) I respond to the applications in front of me, etc. to more of a case navigator, user-focused model."

One Grantee did just that. After launching a program, the program manager noticed that local businesses who would benefit from the program were too over-burdened with overlapping disasters to do all of the eligibility documentation required. So, the program manager shifted to a version of case management (much like what is often done in disaster housing response). He physically went to the businesses with a checklist of the documents needed and took photos of the necessary documents with his phone to help them get through the process.

City of Dorris Splash Pad (The only Splash Pad in Siskiyou County), Photo Credit: Great Northern Services

HOW TO: DESIGNING ECONOMIC DEVELOPMENT PROGRAMS

Challenge: Local businesses that are owned and staffed by low income community members may be displaced, while businesses with more resources (but that are not built by the low income community) benefit.

Strategic Approach: Meaningfully engage with people who are most impacted by persistent service gaps about the businesses that are missing from their community or are underresourced. Use this learning to inform decisions about economic development that will serve, rather than harm and/or displace, these community members.

ACTION STEPS	CONTEXT & EXAMPLES	QUESTIONS FOR REFLECTION
As with other forms of programming, begin with engagement in order to identify the priorities and wisdom of low-income community members, as well as the obstacles they face to participation.	▪ Meaningful engagement and relationship development with local businesses that experience disinvestment and obstacles to participation and the community members who rely on them early on in the process can help Grantees understand the priorities and unique needs of these businesses. ▪ These priorities should then inform the criteria for selecting which businesses are invested in, as well as how you can support businesses in gaining access to the program.	▪ Have you asked for feedback during your engagement process on the economic development priorities of the areas with long-standing service gaps? ▪ Have these priorities informed your selection criteria and weighting when you are choosing businesses to invest in? ▪ Have you asked what obstacles businesses owned or staffed by low-income community members face when navigating your programs? ▪ Have you worked to remove obstacles for businesses to access your programs? Did you follow up to ask, 'how did we do?'
Screen the location, the type of business (and type of jobs being created) through the lens of community responsiveness.	▪ As relationships are built through the engagement process, hire local community-based leaders to help advise on program decisions, such as screening businesses and job creation.	▪ Does this business belong here? ▪ Does it reflect the priorities and needs of the local low-income residents CDBG is designed to serve? ▪ Is it run and staffed by local, low-income community members who understand the priorities of the community and are well-positioned to meet the need?

	▪ It is important that businesses meet the needs of the low-income community members currently living there. Does it sell products and/or offer services that are affordable and desirable to them? Or is it catering to the needs of people with more money or from outside the area (e.g., high end clothing store) (GMM Ch. 2, 2.5.14). Consider that bringing in businesses that change the character of the neighborhood or increase its cost can lead to displacement. ▪ When conducting such analysis and creating program parameters, these must be documented in program guidelines and applied consistently to all applicants.	▪ Will it support the community or take from it? ▪ Are you receiving input from folks within the most impacted communities on the relevance of the services these businesses offer? ▪ If not, how can you strengthen these relationships?
Ensure that you are funding businesses and people who are from the local low-income community CDBG dollars are intended to support.	▪ When providing microenterprise assistance, prioritize businesses owned by members of the local impacted community, businesses that will provide job opportunities for local residents, and that provide services valued by this community. When working to qualify a program under Low/Mod Jobs, critically analyze the ownership model to ensure that low-income residents are benefitting from this employment in economically stabilizing ways rather than being exploited. ▪ When conducting such analysis and creating program parameters, these must be documented in program guidelines and applied consistently to all applicants.	▪ Are the people/businesses you are funding local? ▪ Are they owned by folks who are low income and who have less access to other forms of economic assistance? ▪ Are the low-income people who work for these businesses more economically secure because of these jobs? ▪ Have you asked your community-based partners their thoughts on these businesses and their business practices?

Market the program proactively to people/businesses that may not have relationships with the government and/or may not seek information in traditionally used channels.	▪ Ask CBOs and/or community-based leaders you have built relationships with for suggestions of businesses to contact. Ask them if they are willing to introduce you, and/or if they can recommend channels that would be appropriate places for you to conduct outreach. Proactively look for local businesses who have not worked with the government before and who are central to the low-income community members being served. Direct engagement may be most effective here.	▪ Are you proactively working to meet and build relationships with new people and businesses? ▪ Are you looking for existing and new businesses that are deeply responsive to the priorities and values of the low-income communities you are seeking to serve? ▪ How do you know whether a business is a good fit for a neighborhood? Whose advice are you seeking?
Provide flexible capacity building and resources to small, local businesses. Go to them, don't make them come to you.	▪ Provide support, such as loans, back-office help, training, etc. that can support the actual needs and capacity of small businesses, be transparent about what is available, and then navigate folks through the process.	▪ As you build relationships with small businesses, are you asking them what roadblocks exist within your program? ▪ Have you provided capacity support to help remove these roadblocks?
Move beyond measuring the number of jobs being created to ensure that the jobs being created pay a thriving wage that will support the community.	▪ Expand the criteria used to measure programmatic success beyond the number of jobs to include wages and benefits relative to the cost of living, retention over time, and periodic employee surveys assessing whether workers feel fully supported by their employer.	▪ How holistically do you measure the success of your program? ▪ Are you shifting from number of jobs to quality and overall impact of jobs, so that you can match the impact of CDBG to its intent?
Support businesses that have or are working to put community responsive hiring practices in place.	▪ Businesses funded with CDBG money should maximize their ability to hire and resource people who are low-income by ensuring job descriptions and interviews value lived experience, focus on skills rather than credentials, and have removed gatekeeping requirements and non-essential job functions. (GMM Ch. 2, 2.2.4). Efforts to retain and support low-income staff members should be provided, such as mentoring, support, and accounting for needs that are connected to disability, parenthood, access to transportation, etc.	▪ Is the business able to demonstrate how they have operationalized community responsive hiring practices? ▪ Is the business able to retain and support low-income staff members? ▪ Were you able to assess this information without adding an undue burden of documentation to under-resourced businesses?

The larger the business, the more scrutiny that the Grantee should apply regarding the previous three recommendations, and the greater the impact that the company will have on the community as a whole, specifically for the people who are most affected by persistent gaps in opportunity.	▪ Sometimes, businesses that are not a fit for the skills of local folks who are unemployed move into the neighborhood. In order to fill the jobs, these businesses recruit employees from outside the community, so people end up commuting in for jobs and taking their paychecks back home to fund their schools and local governments and spend in their community's stores. This is doubly problematic when Grantees use tax incentives to lure the companies in.	▪ Have you done your best to resource small, local businesses before working with larger businesses from outside of the area? ▪ Have you thought through the consequences of bringing in a large company and increased your level of scrutiny on their practices accordingly?
Ensure that all of the services you provide are available in the preferred languages of business owners and prospective business owners in your area.	▪ Collaborate with HCD and/or other Grantees to create a resource bank that can support language access to businesses at every step of the process, including a pre-vetted list of translators and interpreters who can help translate complex legal language as well.	▪ Do you understand the language access needs of the local businesses? ▪ How can you prepare to provide all of your services in the preferred language of business owners? ▪ How can you share resources internally so all Grantees can meet this need?

Why it Works

Economic Development is a core component of CDBG, in that it has the potential to meaningfully stabilize the economic reality of low-income individuals and communities. (This is why, in previous sections, such as workforce relations, we've included information about how to leverage all programs to include economic development, even if indirectly.) Low-income community members, including business owners, have disproportionately experienced persistent gaps in services and investment, and economic development programs can right that wrong. They can improve the economic stability of small business owners and low-income workers, and can simultaneously bring services, stores, etc. into communities that are often resource deserts.

But economic development programs also carry the possibility of leading to displacement. Building programs that anticipate the various forms of displacement that can arise, and that work to avoid a mismatch between long-standing community members and new businesses, can keep economic growth in the hands of the low-income communities CDBG is meant to support.

GMM References

Chapter 2, Section 2.2.4 - Low/Mod Jobs (LMJ)

Chapter 2, Section 2.5.14 - Microenterprise Assistance

Chapter 9, Section 9.5.2 - Non-Residential Moving Expenses

Public Facilities, Infrastructure, Improvements

CDBG money can be used to build or improve upon existing facilities in a low-income area that are to be used by the general public, such as libraries, cultural centers, community centers, etc., or which will be used to provide shelter for specific populations under certain circumstances, such as survivors of domestic violence, migrant farm workers, people with developmental disabilities, and people experiencing houselessness. Funds can also be used for new or improved infrastructure, such as sidewalks, parks, water lines, streets, utility lines, public art, and broadband (GMM Chapter 2). (Note that operation of any of these types of facilities falls under public services, which is addressed in the next subsection.)

In order to ensure that Public Facilities, Infrastructure, and Improvement Programs are maximizing their positive impact on the low-income community members who are the intended recipients of CDBG funding, the project must:

1. *Infuse resources into low-income neighborhoods that have experienced persistent service gaps*
2. *Be designed in alignment with and responsive to the values, priorities, needs, and realities of the low-income community members CDBG is intended to reach*
3. *Do no harm (in other words, do not fragment communities or separate people physically from needed services, displace as few people as possible, be mindful about where the waste-water treatment plan will go if a sewer system is being updated, etc.).*

It's important to remember that this is the one area of CDBG where eminent domain is an available strategy. Eminent domain has a history of creating catastrophic harm for community members who are not involved in the decision-making process. Please see Appendix B, Section 4.3 regarding relocation to better understand the impact of eminent domain.

Challenge Spotlight: NIMBYism Undermines a Program for the Unsheltered

In a wealthy County in Northern California, County officials created a plan to purchase a site and dedicate it to housing for people experiencing houselessness. They got so much pushback from the well-resourced, well-connected community members, that they abandoned the program in favor of a navigation center to help unsheltered people access resources. The program that they are running is at capacity, demonstrating the need for the original program as well. In other words, the preferences of the people with the most resources were prioritized above the needs of the folks with the least. This happens often, especially in communities with large income/wealth gaps, as current systems (including the mechanisms by which elected officials keep their jobs) are designed to center the folks who are the most well-connected and -resourced.

Town of Mammoth Lakes Access Apartments Rehabilitation, Photo Credits: Eastern Sierra Community Housing

HOW TO: DESIGNING PUBLIC FACILITIES, INFRASTRUCTURE, AND IMPROVEMENT PROGRAMS

Challenge: Grantees struggle to create Public Facilities programs that are community responsive and mitigate harm to low income residents.

Strategic Approach: Design and implement these programs in a way that responds to the stated needs of the low income community, and integrate mitigation strategies to prevent displacement of current residents.

ACTION STEPS	CONTEXT & EXAMPLES	QUESTIONS FOR REFLECTION
Use community engagement to connect with community members who are most impacted by service gaps to learn what facilities or infrastructure they would prioritize bringing into their community, and implement it in a responsive way.	▪ Make it easy for populations most impacted by service gaps to engage with your design process. Go to them to learn how current infrastructure impacts their day-to-day lives. Walk the sidewalks, bike the roads, visit the facilities and talk to folks currently using them. Ask what their priorities are and what considerations are important during implementation of an upcoming project.	▪ Do your engagement efforts focus on communities most impacted by service gaps? ▪ How can you go to the community to better understand their experiences, needs and priorities and apply them in your program design? ▪ How can you nurture these relationships throughout the entire project process?
Put safeguards in place to address the unintended but predictable consequences of facility or infrastructure improvements (such as rising housing costs) on community members who are economically vulnerable.	▪ Hire contractors from within (and who hire from within) the community being served so that they can reap the economic benefits as well and continue to thrive in their neighborhood. Couple this with job programs (that genuinely serve the most impacted low-income community members), and put programs like direct rental assistance in collaboration with the local Housing Authority on the agenda moving forward if rents start to rise.	▪ Through conversations with low-income community members, have you identified potential unintended consequences of your programs? ▪ Are you prepared to address these consequences in ways that support the folks who are most impacted by them? ▪ If not, can you fund and/or partner with other organizations who can?

Ensure that anyone who is directly impacted by the project is compensated fairly economically, but also that their non-economic needs are met, such as the need for community.	▪ When engaging with low-income community members, ask how they see a project impacting their lives, and ask what they need in order to account for and address potential negative impacts. If what appears to be an abandoned parking lot is used for community gatherings, efforts should be made beyond financial compensation to meet the need for public gathering spaces (GMM Ch. 8, 8.4).	▪ Do you understand the holistic needs of the community you are intending to serve? ▪ How are you creatively working to meet those needs? ▪ What local partners can you bring in to help with this?
Notice the potential impact of the project beyond the folks most directly impacted, including the folks who live across the street and the community as a whole.	▪ Brainstorm how to anticipate and address the impacts of your programming at multiple levels. For example, when building a new sewer system, think about the placement and impact of the waste-water treatment plant. ▪ When putting in a new park, consider what that may do to noise level for the neighbors and to the rents of the people living in the neighborhood.	▪ Is this going to have a harmful impact on communities who have already suffered due to persistent gaps in services? ▪ What about the neighbors across the street? Do they have the means to relocate if this impacts them negatively?
Critically evaluate the impact when a project is framed as for the "public good."	▪ Think critically about what you mean by the "public good," and do not ask a small community with little decision-making power to shoulder the burden of a program while it benefits others in the community whose voices are heard in decision-making spaces. ▪ Simultaneously, don't sink a project that really is in the public good because a small subset of community members who are high-income and have a lot of sway in decision-making spaces are against it.	▪ Does your project frame the impact as for the "public good?" ▪ If so, have you critically analyzed who will actually benefit and who will shoulder the burden? ▪ Are the low-income people who CDBG is intended to serve benefitting from the project and not carrying undue burden?

Think about meaningful access when asking about a community's needs.	▪ When engaging a community about a specific project, ask about their needs in relation to how they want to access the project. For example, a new library that isn't near a bus stop, bike or safe walking routes, or a new park that is only accessible by crossing a highway, will likely be underutilized (GMM Ch. 2, 2.5.2).	▪ Do you understand how the community intends to access this project? ▪ Will their transportation needs be meaningfully met? ▪ What assumptions might you be making in your project design? Have you checked these assumptions with the community?

Why it Works

Infusing resources into communities who have experienced persistent gaps in service provision is at the heart of CDBG. Sometimes this comes in the form of direct assistance, but public facilities can positively impact the lives and the stability of more people. The problem is, new, shiny public facilities intended to benefit a low-income area can raise housing costs, which benefits homeowners and developers, but may displace long-time, low-income community members and renters.

And so while the CDBG project may have been initially successful, in the end, if these unintended consequences aren't mitigated, the overall impact is that it may not, in the long run, meet the National Objective.

Proactively putting these protective strategies into place can keep the project aligned with the intent of CDBG and the fulfillment of the National Objective, because they are responsive to the realities of the ways community characteristics can change when investment patterns shift.

GMM References

Chapter 2, Section 2.5 - Eligible Activities

Chapter 8, Section 8.4 - Eminent Domain

Public Services

CDBG money can be spent to either create a new public service or to significantly increase the reach of an existing one for people and communities that are low income. It can also be used to support a nonprofit whose operating costs have gone up so that they are able to continue to provide a public service. Public services include, but are not limited to, the operations of childcare, health care, job training, recreation programs, education programs, services for a prioritized group of people such as elders and survivors of domestic violence, emergency assistance payments, and legal services (GMM Chapter 2). (Note that the creation or expansion of facilities used for these purposes falls under Public Facilities, addressed in the previous subsection.)

In order to ensure that Public Services programs are maximizing their impact on the low-income community members who are the intended recipients of CDBG funding, the project must:

1. *Fund services that are needed by and aligned with the values and priorities of the low-income community members being served.*
2. *Infuse resources into community-led initiatives*
3. *Fund services that preserve the dignity of all community members*
4. *Be meaningfully accessible by these community members*

A community responsive Public Facilities program begins with engaging community members who are most impacted to ask what sort of a program is in line with their priorities, wisdom, and ways of being, rather than assuming that the government has the answers to people's problems. This is most likely to happen successfully when this money is invested in community-led programs that are run and staffed by members of the local, low-income community itself. It involves meaningful outreach through trusted partners and minimizing roadblocks to participation.

Challenge Spotlight: An Expansive Take on Rental Assistance

During the implementation of CDBG-CV, a Grantee in Southern California expanded their emergency rental assistance program to include hotel vouchers, so that they could provide housing to the portion of their population that do work as migrant farmworkers, who need short-term housing only. This is a great example of being responsive to the needs of community members who are most impacted by persistent service gaps.

HOW TO: DESIGNING PUBLIC SERVICES PROGRAMS		
Challenge: Services offered may not be responsive to the priorities of low income community members, and/or they may be structurally, practically, or geographically inaccessible.		
Strategic Approach: Understand and empower a community to decide what services their neighborhood needs based on values and priorities shared by the community itself.		
ACTION STEPS	**CONTEXT & EXAMPLES**	**QUESTIONS FOR REFLECTION**
Engage the community members who are most impacted by persistent service gaps to ask what services would meet their needs, as well as how these services should operate, where they are, etc.	▪ This can happen in an open-ended way or in a targeted way (if there is a particular issue, such as mental health struggles or childcare deserts, that are arising within your community). ▪ But you can also do some work ahead of time with CBLs to develop preliminary ideas for community review and feedback. If you come to a community with ideas, make sure you're checking your assumptions about why these issues are present. There is a long history of pathologizing low-income community members, and blaming them for the challenges they come up against. ▪ Regardless of which approach you use, do not bring a fully baked program to community members with limited room to shift it. Make sure to approach folks early and often so that their ideas meaningfully impact the program design phase.	▪ What services do impacted community members want? ▪ What is important to understand about how to implement these services so that people feel a sense of dignity throughout and like they belong? ▪ How are you creating space for the community to meaningfully inform service design?
Work to ensure that the services you provide are community responsive.	▪ Learn about the practices and values of the varied low-income community members you are serving and ask how best to weave these practices and values into service provision. For example, providing food may be an important form of respect in their community, as is where the food comes from and how it is presented.	▪ Are you making an effort to learn about the values and practices of the low-income community members you are serving, and to view them with the respect that they deserve, even if they differ from your own? ▪ Are you building trusting, reciprocal relationships so that people feel safe to share these values and priorities with you?

		▪ Are you willing to hand over design power to the community members themselves, who are experts in their own values and priorities?
Ask community members what is already working in their community and how you can resource that work (before coming in with something new).	▪ The community is likely already finding ways to meet their collective needs, though for low-income communities, this is often happening without sufficient resources. Build the trust to ask what is already working and how additional funds can support it. For example, there may already be unofficial mutual aid systems, neighborhood childcare, or a local business that offers emergency loans.	▪ How are you investing in building trust with members of impacted communities? ▪ How might you learn about community-led services that can be supported? ▪ Are you ready to trust that community members may hold expertise in how to provide services that are aligned with their values and priorities, even if it is difficult for you to recognize this form of service provision?
Let low-income community members define success.	▪ Work to understand how the impacted community already defines success, which is rarely as simple as the "number of people served" and is often context specific. For example, success might be the quality of the experience even if the quantity of people served is relatively low. ▪ Use this information to backwards plan. If quality is more important than quality, the specifics of service delivery will need to be different.	▪ How would the impacted community define the success of this service? ▪ How can you use this measure of success to inform shifts in this program or to guide future programs? ▪ Can you create a team of community members (who receive a stipend) to do the evaluation of the program? Or at least to ground truth the evaluation that you do?
Eliminate service-related obstacles to participation.	▪ Notice who is not participating in a service and work to understand why by building relationships with local community organizations and leaders. ▪ Follow their lead in working to build trust through community engagement and shift your spaces and programming to better meet their needs.	▪ Do you understand the obstacles to participation that some low-income community members may be experiencing? ▪ How do you know what the obstacles are, how they operate, and how their impacts can be minimized successfully?

		▪ What are you doing to mitigate the obstacles' impact so that folks who experience persistent service gaps can participate?
Eliminate geographical obstacles to participation.	▪ Ensure services are accessible by public transportation. ▪ Ensure that services are appropriately easy to find, or that they are appropriately hidden if needed for safety reasons (such as services for survivors of domestic violence). ▪ Ensure that services don't cross the invisible borders that separate microcommunities from each other, which might make accessing them dangerous or uncomfortable for some low-income folks.	▪ How might you build trust in order to understand what physical obstacles to participation may exist, before a service is already designed and located? ▪ Are you centering the perspectives of the people who are most likely to experience these challenges (such as folks without access to a car) in your design process? ▪ Have you considered whether this service should be highly visible or less so, and designed it as such? ▪ Have you learned about the subtle borderlines that exist within communities so that your intended user feels comfortable accessing the service?
Minimize the amount (and be mindful of the type) of documentation people must provide to participate.	▪ Asking people for too much personal data, especially when they do not have long-standing, trusting relationships with you, can drive people out of participating. This is especially true when the service being provided is sensitive, and addresses an issue that potentially carries stigma or potential danger. ▪ Do not ask folks to provide a social security number or a green card. Keep forms simple, minimal, and include only what's required. Do not collect data without a purpose.	▪ Do you need this information? Do you really need it? Why?

When collecting demographic data, be mindful of the lack of trust community members rightfully have with the government around their data and around the legitimate security concerns that arise in any setting where identifying information is collected. Treat data collected with respect as a step towards healing lack of trust.	▪ Be proactively transparent about why demographic data is being collected and how it will be used. ▪ Commit to, and follow through with, separating demographic data from people's names. ▪ Use the data collected to inform decision making and direct funding towards the low-income community members who are not being sufficiently supported, not just to report on compliance within funding objectives.	▪ Do you understand internally why you are collecting demographic data, how it will be used, and how you will keep it safe? ▪ Have you communicated this to participants? ▪ Are you using this data to inform decision making and/or direct funding to impacted communities, or to check a box?
Be mindful that many community members may feel differently about receiving direct benefits than they will about using a subsidized program.	▪ Folks who receive direct benefits are often stigmatized. Bring some awareness to decision-making and be mindful of this in your outreach. Work with trusted partners and ask what folks need to feel dignified and safe to engage.	▪ Do you understand how your program may be perceived in the larger community context? ▪ Are you working to understand what participants need to feel dignified and safe?

Why it Works

Community members are experts in their own lives. They know, viscerally, not just what service gaps need to be filled, but how they might be filled in ways that feel affirming to them and aligned with their values and priorities. They know the roadblocks they might face to participation, and how they would prefer to circumvent those roadblocks.

They also often already have informal services that they are providing within their own communities with insufficient resources, but a lot of love and care. Engaging low-income community members to co-design service approaches, and funding existing or new programs that are designed, led, and staffed by them, makes the Grantee's job easier by reducing the burden of sole responsibility for program development, and will ultimately improve participant recruitment.

GMM References

Chapter 2, Section 2.5.7 - Public Services

Chapter 4, Section 4.4 - Accessibility

Chapter 4, Section 4.4 - Limited English Proficiency

Chapter 10, Section 10.5 - Access to Records and Maintaining Confidentiality

Cross-Programmatic Considerations

Intro

CDBG is intended to infuse resources into low-income communities to improve the overall well-being of the people who live there and create the conditions for economic stability. Much of the focus is on developing programs that are responsive to the needs but also to the priorities and values of these low-income community members. In order to achieve this goal, all CDBG programs, regardless of program type, must:

1. *Be accessible, relevant, and community responsive*
2. *Minimize the potential for and mitigate the harm of displacement (whether direct or indirect, formal or informal), and*
3. *Put as little burden as possible on the low-income community members that CDBG is meant to serve, so as to maximize participation and positive outcomes.*

But frequent challenges to this arise. Grantees may struggle to create programs that are accessible, relevant, and/or community responsive. Programs may result in displacement, either directly or as a secondary unintended consequence, and burdens may be placed on participants to either meet a regulation or because "that's how it's always been done." When it comes to designing community responsive programs, Grantees must consider the impacts of these burdens on the very community members they intend to serve and mitigate the harm.

A Strategic Approach to Cross-Programatic Considerations

Designing programs that are accessible, relevant, and community responsive will make the dissemination of funds easier for Grantees, and better align whatever program emerges with the National Objectives and the intent of CDBG. Mitigating displacement of low-income community members is paramount, as displacement is deeply destabilizing and is therefore in direct conflict with community well-being. Streamlining documentation-for-eligibility processes will increase program uptake, and, as every Grantee knows, a program without participants is not a program at all.

The table below outlines the goal, the challenges, and the strategic approaches associated with three cross-programmatic considerations of program design. Following this table, you will find that each challenge area has its own implementation table, with concrete steps to take in order to ensure that your program is responsive to your local context and to the needs and priorities of the low-income communities you are serving.

A SNAPSHOT: COMMUNITY RESPONSIVE APPROACH TO CROSS-PROGRAMATIC CONSIDERATIONS			
GOAL	Grantees design, implement, and evaluate programs that are accessible, relevant, and community responsive, that minimize community displacement, and that place as few burdens as possible on low income community members.		
CROSS PROGRAMMATIC CONSIDERATIONS	Accessibility, Relevance, and Community Responsiveness	Displacement and Relocation	Documentation and Hyperregulation
CHALLENGES	Programs funded are not meaningfully responding to the needs, priorities, and desires of the community members served by local governments nor to the realities on ground.	Many CDBG programs either include relocation in them or result in indirect displacement, severing communities from each other and from resources, and destabilizing people's lives.	Onerous and intimidating paperwork and documentation for eligibility requirements dissuade many low income people from participating in CDBG programs.
ROOT CAUSES	Grantees struggle to fully understand all of the obstacles that get in the way of participation or that make well intentioned programs feel irrelevant or unresponsive to people, and mechanisms aren't in place to turn this information into program design shifts.	Whether relocation is a direct or indirect result of a program, the CDBG regulations treat this as purely an individual and an economic issue, so the broader impacts on low income people's and communities' well being are not sufficiently addressed.	Regulations around eligibility documentation regularly change and are confusing, and the bureaucratic load is difficult for Grantees to wade through. Additionally, the regulations are built to protect the government from benefits fraud rather than to facilitate easy entry into CDBG programs.
STRATEGIC APPROACHES	Engage the low income community members who are most likely to benefit from CDBG programs but least likely to participate, so that you can learn from them about what would make your program feel accessible, affirming, and relevant to them. Then, integrate these learnings.	Center the people being relocated (their values, their priorities, their needs) in all aspects of the relocation process, anticipate unintended consequences, and mitigate harm.	Shift the lens from protecting the government from fraud to getting people into the program by limiting requirements to the minimum and helping people meet these requirements.

MEASUREMENTS OF SUCCESS	Grantees conduct ongoing engagement cycles before, during, and after the design of a program with communities experiencing persistent service gaps. Program participation and satisfaction rates go up.	Displacement rates are lowered. Participants report being supported in the case of displacement or relocation.	Grantees narrow their requirements to only those expressly required. Participants report feeling engaged and supporting through every step of the process. Rates of participation and completion of programs increases.

The three subsections below each provide a table with concrete steps to take (as well as examples, context, and reflection questions) to address these challenges strategically and reach the overall goal, regardless of the type of program you are creating.

Accessibility, Relevance, and Community Responsiveness

CDBG is intended to make a meaningful impact on the lives of people who are low income, increasing their economic stability and the community's well-being. In order to ensure that programs are maximizing their impact on the low-income community members who are the intended recipients of CDBG funding, the project must:

1. *Be accessible: ensuring that every low-income community member can fully participate, regardless of the specifics of their situation.*
2. *Be relevant: responding to the current, actual stated needs of low-income community members*
3. *Be community responsive: incorporate the priorities, values, and ways of knowing and being of community members*

Without these three components, a program is simply unable to meet the National Objective of supporting low-income communities or the intent of CDBG to bring economic stability and allow communities to self-determine.

Congress has passed several laws (such as the Americans with Disabilities Act and Civil Rights Act) and many Presidents have signed Executive Orders that aim to guarantee that everyone has access to federally funded programs such as CDBG. Relevance and community responsiveness are addressed indirectly in the regulations, through proxies such as the public participation requirements. Program participation is deemed a measure of relevance. But there are no regulatory levers for ensuring that what is created is actually based on community feedback. Because the federal regulations are largely quiet on these two crucial points, it is up to federal agencies and their Grantees, such as HCD, to provide guidance and insight on how to make CDBG-funded programs not only accessible but also relevant and responsive to the needs and ways of the community.

Accessible, relevant, and community responsive programs are the result of deep relationship building, engagement, and decision-making processes and feedback loops that ensure that low-income community members' experiences and priorities are baked into program design.

HOW TO: DESIGNING ACCESSIBLE, RELEVANT, AND COMMUNITY RESPONSIVE PROGRAMS		
Challenge: Programs funded are not meaningfully responding to the needs, priorities, and desires of the community members served by local governments nor to the realities on ground.		
Strategic Approach: Engage the low income community members who are most likely to benefit from CDBG programs but least likely to participate, so that you can learn from them about what would make your program feel accessible, affirming, and relevant to them. Then, integrate these learnings.		
ACTION STEPS	**CONTEXT & EXAMPLES**	**QUESTIONS FOR REFLECTION**
Analyze the information gathered during engagement processes through a community responsive lens.	▪ Overlay the demographic data gathered with the insights from the engagement process to determine the most high-priority, relevant programming needed within the community, according to the low-income community members who have experienced the most persistent service gaps.	▪ What were the dreams most commonly expressed by the folks who are most impacted by persistent service gaps? ▪ How can you weave these dreams into program design?
Move beyond asking community members to identify the problem. Ask for their proposed solutions as well and ask for feedback on any solutions you propose.	▪ Asking this question can simultaneously ease the Grantee's job of having to invent solutions on its own and ensure that programming is community responsive. Low-income community members are experts in their lives, in the gaps in services that need filling and the ways in which these gaps can be filled that preserve dignity and are aligned with their values. ▪ It is fine, and often a kindness, to come to engagement activities with some ideas of proposed solutions, so that you are not simply asking community members to do all of the heavy lifting, but be ready to incorporate feedback and/or pivot entirely.	▪ What gaps are most pressing for folks, and what ideas were provided to address them? ▪ What is already working within the community that could be amplified and/or better resourced? ▪ Are there any shifts in current programming that would make them more effective? ▪ What solutions do community members want?

Design programs and communications that are readily accessible for everyone, independent of physical, emotional, or intellectual makeup.	▪ Create a resource bank to support varied needs, such as sharing translation devices, ASL translator contacts, or technological accessibility tools. Provide a list in multiple languages of what accessibility services you offer, such as microphones, visuals to accompany audio, hybrid options, family bathrooms, and ADA compliance. Create and publicize simple feedback systems for community members to share their additional accessibility needs (GMM Ch. 4, 4.4).	▪ Have you compiled a list of accessibility services you can offer? ▪ Have you created and promoted ways for folks to ask for additional accessibility needs in an affirming way? ▪ Have you created a buffer in your budget and timeline to meet additional accessibility needs? ▪ Have you proactively contacted CBOs who work with differently abled folks to ask what accessibility needs exist?
Create feedback loops in communication by hiring community-based leaders.	▪ Hire people from within the community to create and facilitate feedback loops and transparent, bidirectional communication throughout the process. This could be in the form of a direct hire or providing ample funding to a CBO to add staff capacity (including overhead costs).	▪ Do you have trusted community leaders on staff? ▪ Do you have clear communications practices that ensure transparent, bidirectional communication with the community throughout the process? ▪ When you receive feedback, do you respond to it?
Return to the communities engaged to reflect back what you heard to ensure accuracy. This also helps build trust and relationships.	▪ As you design a program based on the input from community engagement, return to the community to ask: "Did we get it right?" ▪ Make sure that you do this when there is still room to make adjustments to your program in response to community direction. Then, make these changes.	▪ Did you get it right? ▪ What still needs to change? ▪ Have you created time to incorporate changes and learnings from the reflection sessions?
Be flexible and nimble in response to feedback.	▪ Getting this right does not necessarily mean getting everything right at every step. But it does include humility and a willingness to shift. Feedback is a gift, not something anyone is entitled to.	▪ Are you receiving feedback? If not, how can you deepen your trust with impacted communities? ▪ When you receive feedback, do you take time to pause, reflect, and determine how to respond?

Spotlight: Opportunities for Accessible, Relevant, Community Responsive Programming

Among the activities that are eligible for CDBG funding when assisting for-profit businesses, Grantees can provide services or benefits to newly hired employees that allow them to hold the jobs, such as transportation to the jobsite or day care assistance. The company can provide subsidies or vouchers to employees to obtain such services on their own; or the company can provide these services directly for their employees (for example, operating an on-site day care center); or the company can contract with a third party to provide/operate these services (for example, contracting with a bus service to transport employees to work).

Following through on the daycare example, if the company provides vouchers, employees can find the support that feels like the right fit for their families. In places where there is not enough childcare available to meet the need, companies can and should ensure that they are not only providing care, but hiring and following the lead of practitioners from within the community being served.

GMM References

Chapter 2, Section 2.5.12 - Eligible Activities

Chapter 4, Section 4.4 - Accessibility

County of Nevada Interfaith Food Ministry, Photo Credit: Rob Choate

Displacement and Relocation:

Displacement – the temporary or permanent, direct or indirect, voluntary or involuntary relocation of individuals, households, businesses, and/or communities – is an outcome of many CDBG programs. Relocation is an important component of the development work of CDBG. The Uniform Relocation Assistance and Real Property Acquisition Act (URA)*, as discussed in GMM Chapter 9, is a federal law that establishes a minimum standard for federally funded programs and projects that require acquisition of real property or the displacement of persons from homes, business, or farms. This federal law applies to all CDBG funded activities that may result in any required relocation. The law outlines the necessary steps to provide adequate notice to any persons who may be displaced or affected by a federally funded action, along with establishing relocation benefit requirements, including financial compensation for relocation to comparable units. While the URA is designed to provide households and businesses with notice and compensation, it does not prevent a federally funded project from moving forward with displacement.

NOTE: Compliance with the URA is required, and noncompliance can jeopardize the use of federal funds for a CDBG project. Because compliance with the URA can significantly increase project costs, it must be considered very early in project planning to ensure all steps and requirements are followed.

The URA addresses the economic harm that people can experience when they are displaced, but the harm of relocation is more than economic, and can both precede relocation and occur even when relocation is averted. The process of relocation, starting with the General Information Notice, initiates toxic stress, which has severe health-related consequences.[13] HCD and Grantees are obligated to do good while mitigating harm. Acknowledging and mitigating the harm in this process includes considering and addressing the emotional well-being of people who may or may not be displaced.

And while there are certainly programs that have relocation (for businesses or households) baked into them, displacement can also be an unintended consequence of any neighborhood investment program[15-17] and/or of events outside the Grantee's control. For example:

- *Direct displacement, which includes voluntary and involuntary displacement, is categorized as the physical removal of a person or a business from their home or community. This happens through many mechanisms, including foreclosure, eviction, condemnation (such as when a landlord keeps a home in such poor condition that tenants are forced to leave due to substandard housing or code enforcement), involuntary relocation, and eminent domain.*

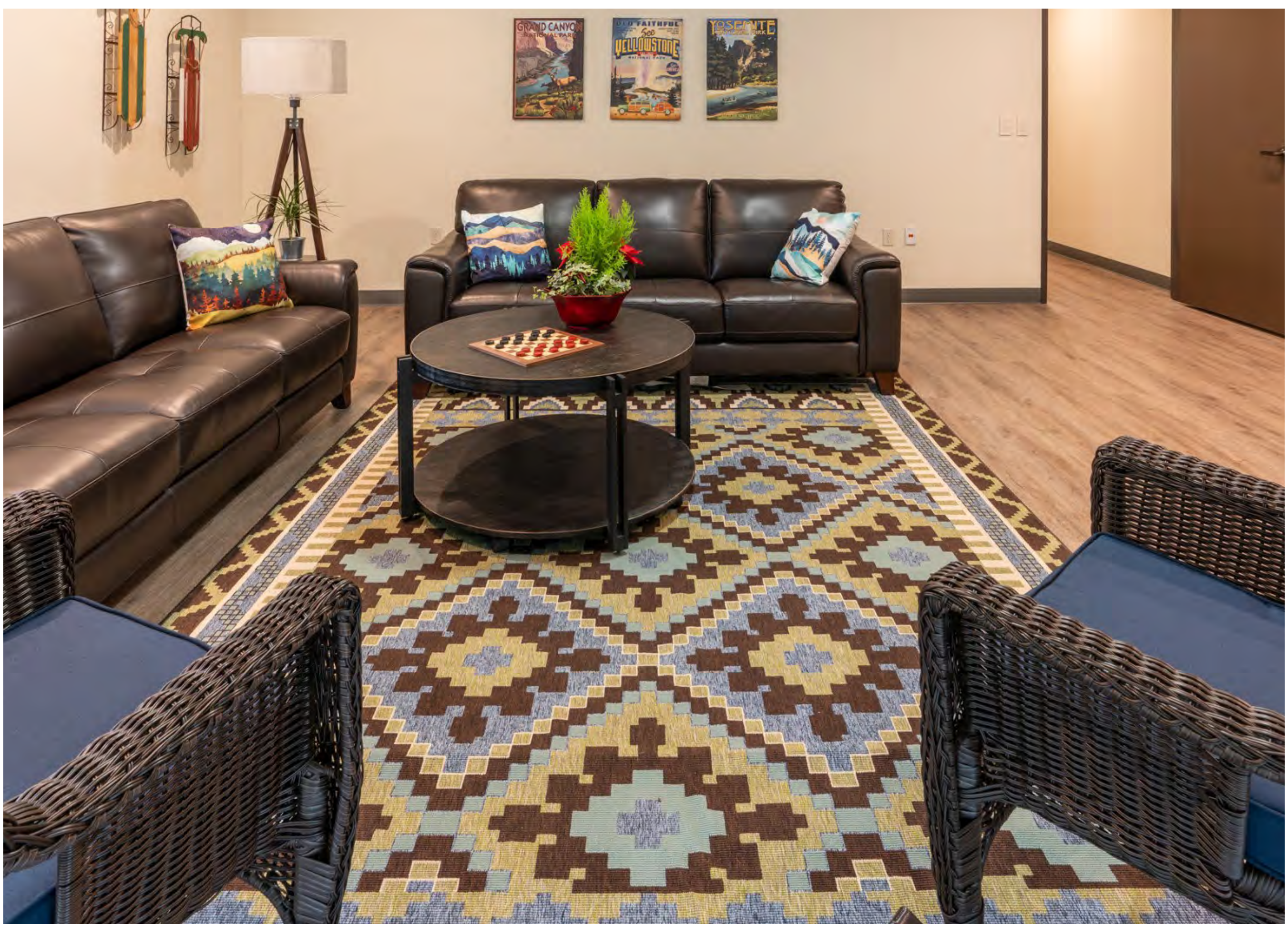
- *Economic displacement happens when speculative markets and rising housing costs push out longtime residents who no longer can afford to live in an area.*

- *Community displacement is the changing of the makeup of communities, by pushing out and/or erasing a critical mass of long-term residents to the point where the community no longer belongs to them. This type of displacement overlaps with physical and economic displacement, as when a community loses (through direct relocation or economic displacement) longstanding community institutions or gathering places.*

> *Disaster displacement has been impacting California and the globe at a higher rate than ever before. From the annual wildfires that rip through communities leaving nothing in their path, to floods and mudslides that bury and wipe out roads and homes, entire communities can find themselves displaced in a matter of hours or days.*

CDBG has a role to play in every form of displacement, either in mitigating the harm of displacement caused by a CDBG program, or responding to displacement that finds its origin elsewhere. When households and/or businesses are forced to relocate, this can have the potential to deeply impact the make-up of a community, including severing access to social networks and community resources.[15,17,18] Taking this into consideration, there are ways to keep the core elements of a community intact. This can include giving businesses and nonprofits the right of first return to a redeveloped space or giving families and individuals the autonomy to decide their priorities for reasonable accommodation.[19,20] Ultimately, it is up to the Grantee to do their due diligence to understand that displacement is multifaceted, and to intentionally center the affected party in the decision-making process that directly affects their lives, giving them back their power.

The first step to addressing displacement is to understand how and when it happens, who is likely to experience it, and the impacts of it that go far beyond economic well-being. The second step is to mitigate the direct and indirect harm caused by displacement, by centering the people who are most impacted by service gaps and resourcing their priorities.[21,22]



County of Nevada Odyssey House, Photo Credit: Kial James

HOW TO: DESIGNING PROGRAMS THAT ADDRESS DISPLACEMENT AND RELOCATION		
Challenge: Many CDBG programs either include relocation in them or result in indirect displacement, severing communities from each other and from resources, and destabilizing people's lives.		
Strategic Approach: Center the people being relocated (their values, their priorities, their needs) in all aspects of the relocation process, anticipate unintended consequences, and mitigate harm.		
ACTION STEPS	**CONTEXT & EXAMPLES**	**QUESTIONS FOR REFLECTION**
Listen to community members who will be impacted by relocation or who may be impacted by indirect displacement, to understand and mitigate the impact that displacement may have on them beyond economic factors. Attune your approach to what they share with you, not just to the regulatory requirements.	▪ Prior to a tenant being made to relocate due to what is deemed substandard housing, first listen to what the tenant wishes to have happen. If the tenant wants to remain in their home, work to make the landlord take responsibility for the poor condition of their home and action to remedy the issues rather than punish the tenant for factors outside of their control (GMM Ch. 9, 9.1). ▪ Sometimes a resident wants to move to a unit that is deemed 'substandard' by the Grantee. The Grantee's role here is to listen to the resident, see their choice through their lens, and work to ensure that they qualify for replacement housing payments in the residence most comfortable to them (GMM Ch. 9, 9.3).	▪ Did you do everything you could to avoid relocation? ▪ Have you worked to build a relationship with the individuals and families impacted by relocation? ▪ If the folks impacted make decisions that don't fit your definition of 'standard' housing, do you work with them to make sure that their priorities and choices are respected and funds are made available to support these choices?
Understand the priorities of folks who will be impacted and center these priorities in your relocation process.	▪ Every effort should be made to ensure referrals are made to comparable units based on geographic priorities of the folks impacted. This may include referrals located outside, as well as within, communities that have and continue to experience persistent service gaps, as these areas may feel more comfortable for some folks, and may include a stronger, pre-established community network (GMM Ch. 9, 9.2; Ch. 9, 9.3).	▪ Have you asked folks impacted what their relocation priorities are? ▪ Are you flexible with how you determine eligibility of moving expense reimbursement, centering the priorities of the people most impacted by this? ▪ Are you trusting the business who you are relocating when they identify necessary moving expenses?

	▪ Knowing a business' priorities should inform how you offer flexibility in reimbursement of moving expenses, by trusting the needs of the business over the financial cost-savings to the Grantee (GMM Ch. 9, 9.5.2)	▪ Are you integrating these priorities into your processes, such as your referral or moving expense reimbursement processes? ▪ Are you prioritizing the financial health of the local business (vs. the expectation of government) when you decide what qualifies as 'reasonable' costs incurred?
Use contextual strategies in the appraisal process, to account for the fact that homes within communities that experience service gaps are often undervalued, when controlling for variables such as size, style, and condition (See App. B, Spotlight, p. 94).	▪ When hiring a third-party appraisal company, ask about how they use a contextual approach to valuing homes, make sure they are aware of, and proactively address, the difference in valuation across neighborhoods (GMM Ch. 8, 8.2), by using comparable houses in multiple communities as part of the appraisal process.	▪ Have you asked your appraisal company about how they implement contextual strategies, such as looking at comparable properties in a variety of neighborhoods, into their valuation process?
Avoid using eminent domain if/ when possible.	▪ If considering eminent domain for the "public good," be clear to define who exactly should be benefiting from the project, build relationships with organizations in that community, and ask what their ideas of "public good" might look like, before moving forward. ▪ Then, look around at what is being sacrificed in the interest of the "public good," and truly consider whether it's worth it. If so, how can the people being impacted negatively be supported to remain whole.	▪ Have you defined who you mean by the public when you say a project is for the "public good?" ▪ Do you have relationships with the communities your project is supposed to benefit? ▪ Have you asked them what they would like to see improved and how? ▪ Have you asked them how you can do this work while creating the least harm? ▪ Have you spoken with the people who will be impacted negatively to identify their needs and be responsive to them?

Prevent severing of community at all costs.	▪ Not all relocations have the same impact. Relocating a locally-owned, community responsive business or CBO that is a hub for social cohesion, and/or providing services not available elsewhere is deeply destructive to the social fabric of a community. All efforts should be made to support these microenterprises and prevent the loss of these community assets (GMM Ch. 2, 2.5.14; Ch. 8, 8.8). ▪ Interrupting access to these hubs by changing transportation options can be equally as harmful. This can include relocating services further from those who use them (moving a business across town to use their land for a park) or modifying how folks access the service (placing a new park that closes a road, rerouting public transportation).	▪ Are you aware of the irreplaceable community assets and hubs of social cohesion in this community? ▪ Are you aware of the transportation needs to access these community hubs? ▪ Are you doing everything you can to keep this community meaningfully intact?
Provide wraparound advisory support to households impacted by displacement beginning at the first notice.	▪ When delivering a Notice of Intent to Acquire (or even a General Information Notice) during an acquisition, recognize the toxic stress this can trigger, and provide emotional and legal support, either directly or through local, trusted service providers. This is especially important when the person under stress may make a decision to move that puts their relocation benefit eligibility at risk (GMM Ch. 8, 8.3). ▪ Minimize the duration of uncertainty between notices in the process, provide advisory support in the recipient's preferred language, and pay for translation services if referring someone to other agencies (GMM Ch. 9, 9.3).	▪ Are you providing personalized advisory services in the languages spoken by impacted families? ▪ Are you minimizing the time periods of uncertainty during the process? ▪ Are you providing accessible, community responsive support to meet emotional, procedural, or legal needs, and/or connecting folks to service providers who can do so?

Provide honest advisory services and transparency about data collection.	▪ Clearly communicate what data is being collected, why it is needed, and how it will be used, especially in relation to relocation eligibility, benefits, and potential project impacts. For example, explain how household income, tenancy status, or business revenue data may influence relocation assistance or program decisions. ▪ Ensure that data collection processes are healing-informed and responsive to stress, recognizing that requests for documentation (e.g., proof of residency, income verification) may feel invasive or overwhelming during an already destabilizing time.	▪ Do people understand why their information is being collected and how it may affect decisions about relocation, assistance, or project outcomes? ▪ Are you being clear and honest about both the possibilities and limitations of the support your program can provide? ▪ How are you ensuring that data collection processes feel respectful, supportive, and manageable, especially for those experiencing stress or uncertainty?
Create warm hand-off processes to trusted partners for families who do not qualify for the support offered by CDBG.	▪ Sometimes, families don't qualify for direct support due to regulatory restrictions. It is deeply harmful to deny these families support altogether. CDBG can still create systems of support to provide resources, even when the regulations restrict certain kinds of support. ▪ This could include creating a support line in multiple languages to enroll people in CDBG support and/or to direct people to trusted community partners who can offer support where the regulations fail them (GMM Ch. 9, 9.1) ▪ Have a list ready of local service providers who may be able to support families who knock on your door.	▪ Have you created systems to send people who do not qualify to trusted community partners? ▪ Do these support systems have secure data transfer processes? ▪ Have you and your partners minimized the data collected to regulatory minimums? ▪ Have you communicated with folks impacted about resources you can connect them with?

Proactively provide flexibility and multiple options to meet documentation-for-eligibility requirements.	▪ When gathering documentation to verify eligibility, such as for replacement housing payments, make sure the folks impacted understand that there are multiple ways to verify income, that you will support them through the verification process, and that self-certification is always an option to document eligibility, if other verifiable information is overly burdensome to obtain (GMM Ch. 9, 9.7).	▪ Do people who are being relocated know that there are multiple ways to verify their income? ▪ Are you sure that folks understand what these options are and how to fulfill them? ▪ Have you offered income verification support in their preferred language?
Consider the larger context within which you make reimbursement decisions, and don't let unpredictable recent events lead you to calculate too low a fixed payment.	▪ Consider the impacts of extreme weather events, market crashes, or public health emergencies when calculating a Fixed Payment amount for the relocation of a business or farm, picking a 2-year time period for comparison that is closest to an 'average' year (GMM Ch. 9, 9.1). ▪ For example, the financial crisis of 2008 and the COVID lockdowns of 2020 skewed numbers away from average for many businesses.	▪ Are you selecting a representative time period for comparison when calculating payment amounts?
Make sure folks who are subject to relocation genuinely understand their rights.	▪ Delivering notices that inform people of their rights, such as the Temporary Relocation Notice, is not the same as someone fully understanding their rights. Provide ongoing advisory support that helps recipients know their rights, including the right to support in navigating the appeals process. Consider working with Legal Aid or local service providers who may be better able to communicate in ways that these community members will understand and feel seen, in addition to or instead of a relocation "expert" consultation firm (See App. B, 5.4) (GMM Ch. 9, 9.2).	▪ Did you offer ongoing advisory support in a recipient's preferred language to answer questions about a Notice you delivered? ▪ If folks have questions about their rights after your initial outreach, is there a safe and accessible way for them to follow up to ask questions? ▪ Are you responsive to these questions with compassion, patience, and transparency?

Why it Works

While displacement is at times unavoidable, limiting it and mitigating the harm of it can have a cascading effect to bolster the economic and overall well-being and resilience of a low-income community. The key to investing in communities that have been regularly disinvested from is to do so without pricing residents out of the neighborhood and/or changing the nature of the neighborhood such that they no longer feel like they belong.

Prioritizing people's fundamental right to self-determination during the direct displacement process will help you orient around their priorities, which will leave them feeling supported and whole, and will allow them to make decisions that preserve their own dignity, their economic stability, and their connection to community.

Anticipating unintended consequences that include indirect displacement will prevent an individual CDBG program from undermining the overall intent of CDBG. Building a park can increase rents, which can lower the economic stability of the low-income community members CDBG is meant to serve. Anticipating this and getting rental assistance lined up in advance can keep CDBG aligned with its mission.

Spotlight: A Community Responsive Appraisal Process

Standard real estate appraisal processes reinforce persistent gaps because they exist within the context of historical and present-day restrictive policies as well as appraiser decision-making. John Liss is using his appraisal company, True Footage, to get creative about changing the appraisal process to minimize the impact of these challenges to community development.

He uses comparable homes from multiple neighborhoods (rather than only from the same neighborhood, as is common practice). He also uses technology to measure square footage, a process that he says is deeply subjective when done by a person with a measuring tape. After the technician takes photos of the residence, evidence of personal information of the family (such as family photos) are blurred out. This way the appraiser never has to set foot on the property, creating a buffer that prevents their assumptions from creeping into the bottom line.[23]

Spotlight: Learnings from A Housing Program to Combat Disaster Displacement

A rural county was looking to use the CDBG-CV funds it received to help 20 households in a farmworker community rebuild their homes after they were lost in a fire. The Grantee had a robust plan and personal relationships with the impacted community, but limited capacity, so they tried to bring a consultant in for support. But they couldn't find anyone willing to work in their rural area. Left to themselves, and experiencing staff turnover, they struggled to get out and connect with folks where they live, to start the conversation early, to build and sustain relationships across the distrust that exists, and to enroll and keep people in the program. As the expenditure window neared its expiration date, they'd only been able to qualify five out of the 20 households.

A Grant Administrator involved in the process reflected: "Doing the work upfront is critical. Part of the program design—you can have a small staff and turnover—if you have a process to stay in touch. Understanding community is important. It's a small community within the County, but the community members themselves were (likely) not involved in the development of the program. And people just move or move in with friends or relatives, but the systems for staying in contact are not there."

Grantee strategies to reduce the likelihood of results such as this include:

- *Conducting ongoing community engagement upfront, to inform program design and address obstacles to participation before they arise.*
- *Maintaining a system for knowledge transfer and warm hand-offs when staff members move on.*
- *Creating and implementing a communication system with multiple pathways to stay connected to applicants.*

An HCD support strategy can include:
Working with consultants to expand support services into rural areas and other ''consultant deserts."

GMM References

Chapter 2, Section 2.3 - Elimination of Blight

Chapter 2, Section 2.5.14 - Microenterprise Assistance

Chapter 4, Section 4.1 - California's Housing-Element Law

Chapter 8, Section 8.2 - Voluntary Acquisitions

Chapter 8, Section 8.4 - Eminent Domain

Chapter 8, Section 8.8 - Section 104(d) One-for-One Unit Replacement (Project Requirements)

Chapter 9, Section 9.1 - Relocation and Displacement

Chapter 9, Section 9.2 - General Relocation Requirements under URA

Chapter 9, Section 9.3 - Residential Relocation under URA

Chapter 9, Section 9.5.2 - Non-Residential Moving Expenses

Chapter 9, Section 9.7 - Relocation Assistance Requirements under Section 104(d)

City of Crescent City Pacific Pantry, Photo Credit: City of Crescent City

City of Willows Rumiano Cheese Factory Business Assistance, Photo Credit: HCD Staff

Documentation and Hyper Regulation

Documentation-for-eligibility requirements and hyper regulation of potential applicants to CDBG programs can pose added obstacles for community members to access resources and services. Interestingly, the rules and regulations around documentation-for-eligibility are complicated: At times burdensome, and at times minimizing obstacles such as via self-certification. Sometimes the guidance falls in between, allowing for self-certification, but only as a last resort, and without proactively advertising this as an option. As CDBG funding can be used for so many different eligible activities and National Objective combinations, the federal regulations for the State CDBG program (24 CFR 570.480) clearly document that States have "maximum feasible deference" in their interpretation of the federal regulations, as long as the interpretation isn't plainly inconsistent with the Housing and Community Development Act.

Some of the variation is accounted for by program type: For example, a public facility such as a waste water treatment facility can be constructed and meet a National Objective simply based on the publicly available census data (low-mod-area), which can be collected and reported to HUD without any documentation collected from the beneficiaries (households living in the service area of the public facility). On the other hand, programs with a more direct benefit to individuals or households such as housing down payment programs or daycares must report on the actual households served by the program, and therefore must collect detailed information about the beneficiaries to report to HUD. For these more direct benefit programs, the federal regulations for CDBG don't necessarily specify the method or level of applicant documentation, but the HUD reporting systems do require the reporting of persons and households assisted by income level along with demographic information. States establish their own rules and requirements around income verification and reporting requirements in order to provide HUD the needed information.

But these requirements can be onerous, intimidating, and difficult to navigate, especially for people who have reason to be wary of government agencies and/or who work multiple jobs or low paying jobs with inflexible hours, etc. And because they are mainly in place to protect the government from benefits fraud—which is not a common occurrence[24]—the Grantee has a responsibility to work WITH recipients to navigate these systems in an effort to aid them as much as possible. You can do this by removing unnecessary obstacles in documentation and shifting the burden away from the user.

HOW TO: DESIGNING SUPPORT SYSTEMS THAT ADDRESS DOCUMENTATION & HYPER REGULATION		
Challenge: Onerous and intimidating paperwork and documentation for eligibility requirements dissuade many low income people from participating in CDBG programs.		
Strategic Approach: Shift the lens from protecting the government from fraud to getting people into the program by limiting requirements to the minimum and helping people meet these requirements.		
ACTION STEPS	**CONTEXT & EXAMPLES**	**QUESTIONS FOR REFLECTION**
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.	▪ When calculating the Total Tenant Payment during relocation, proactively offer the opportunity to provide notarized self-certification of income verification, do not wait until the process becomes an "undue hardship." Support the recipient through the documentation process as needed, including offering tech support (GMM Ch. 9, 9.7).	▪ Do you give the benefit of the doubt to folks you are working with through documentation processes? ▪ Do you pause and reflect when assumptions arise about someone's underlying motivation? ▪ Do you proactively remove obstacles and not wait for someone to experience 'undue hardship?'
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) of the HCDA or the URA, the Grantee must ensure the recipient is clear about the impacts of this decision by proactively providing clear information and being available for questions in the applicant's preferred language (GMM Ch. 9, 9.7). ▪ If people aren't reaching out to you, make sure that you are following up with them. Listen to them, and support them with your expertise on the options and how you can help them navigate the process, without assuming that you know which choice is best for them. When there is a piece of the process that you can execute on their behalf, offer to do it.	▪ When you are expecting impacted folks to make critical decisions in a process, are you proactively providing the support necessary? ▪ Are you examining your processes to identify where you can remove work for the end-user? ▪ Are you testing your forms to see where users or line staff who are helping users get stuck, and then redesigning as needed? ▪ Are you reflecting on the impact documentation requirements will have and the rationale behind them before passing them along to the end-user?

Give people as many options as possible for types of documentation and how they can deliver them to you.	▪ When requiring documentation for eligibility, communicate all the forms of documentation accepted and leave the door open for new methods. Allow for screenshots AND PDFs AND paper AND photos. Hand delivered OR texted OR emailed. Pay stubs OR calling someone's boss OR photos of checks OR screenshots of Venmo transactions. Proactively communicate that self-certification is acceptable. For all methods of document collection, be sure to have policies and safeguards in place to ensure personally identifiable data is secure. (See GMM Ch. 10 for more information.)	▪ Have you created systems to capture documentation in a wide array of formats? ▪ Have you communicated to your end-users about all the documentation formats accepted? ▪ Are you offering customized support should additional formats be requested that you had not prepared for? Are you proactively communicating this? ▪ Have you ensured that you have safeguards in place to secure personally identified data regardless of how it is collected?
Be transparent with folks about what is NOT required.	▪ When providing advisory services for folks impacted by displacement, proactively communicate that these advisory services are available to every resident impacted by relocation, regardless of their overall program eligibility.	▪ Have you communicated which services are available to everyone, even folks who may not be eligible for the broader program? ▪ Do you have partners who can help get this word out to all impacted residents in the languages they speak?
Be transparent with folks about what IS required, AND ensure that they know you will help them meet the requirements.	▪ When gathering 'verifiable source documentation' as part of Limited Clientele projects for direct benefits such as tuition payments or indirect benefits such as access to a health clinic, communicate up front what documentation is needed to determine eligibility, why, and what support is available to meet the requirements to receive these benefits (GMM Ch. 2, 2.2.2).	▪ Are you clear internally about what documentation is required and why? ▪ Have you proactively offered support in meeting these requirements? ▪ Have you worked to reduce the verifiable documentation required, and increase the acceptance of self-certification forms?

Require only the minimum amount of documentation required by the regulations for the program type in question.	▪ It's very important to get clear on these minimums yourself. It is not uncommon for Grantees to collect unnecessary information because "that's the way we've always done it" or "that's what the form says" when it's not actually a regulatory requirement. And, as you already know, the regulations change over time. ▪ Annually evaluate the documentation requirements for processes like the Total Tenant Payment (TTP) to assess how to identify obstacles, remove requirements that may have changed, simplify forms, and reduce duplication of efforts (GMM Ch. 9, 9.7)	▪ Do you have a cadence to regularly assess your documentation requirements, remove requirements no longer needed, and simplify processes that have created obstacles?
Protect people's safety in engaging with government programs.	▪ Even the government can't fully protect against data breaches or misuse. And even if they could, there are many low-income community members who don't trust them to do so. This means that people, especially people who have been harmed by government agencies or who have reason to fear such harm (many of whom live in low-income communities) will not participate if they are asked to hand over too much of their personal data. ▪ Do not document anything that is not required. Create systems to protect, secure, and anonymize data that is gathered, and transparently communicate who the data is shared with, and how long it will be stored (GMM Ch. 9, 9.1).	▪ Can you avoid collecting information you are not required to gather? ▪ When developing intake documents, are you critically questioning why you need the information you are asking for? ▪ Are you proactively communicating what documentation will be shared, and with whom? ▪ Are you proactively providing transparency about where you cannot provide safety around documentation? ▪ Do you have access to secure storage and processes to anonymize sensitive information?

Why it Works

Documentation requirements are obstacles to participation. They take time, can at times be hard to provide, and can make people feel like they are being monitored (by an entity that they may not trust to do so) and distrusted.

Documentation also creates undue burden for the Grantee. It adds layers of unnecessary bureaucracy, making program enrollment more complicated and time-consuming than it needs to be. It also makes enrollment more difficult, leaving some programs underenrolled and/or missing segments of the low-income community (many of whom are the lowest earners) for whom fulfilling documentation requirements is the most difficult, due to the nature of their employment, limited resources, etc.

So, getting clear on minimum documentation requirements, being transparent and supportive, and eliminating unnecessary hurdles, will build trust with community members and boost enrollment while lessening the burden on everyone involved.

County of Nevada Odyssey House, Photo Credit: Kial James

Spotlight: Buried Under Piles of Paperwork

In reference to the frequency with which HCD's scoring and programmatic requirements shift, one Grantee shared the following: "The CDBG program does not factor in enough scoring toward... communities [who experience persistent service gaps], and generally adds too many layers of requirements leaving the program complicated. Changing things every year only makes it harder."
— 2022 Community Priorities Survey

The CDBG program was designed to direct resources to the people and communities impacted by disinvestment in the market economy, due to policies and practices of both the private and public sector. This is a simple goal on paper, but in practice, the act of ensuring that money goes where it was intended to go is anything but simple. In order to ensure that CDBG has the intended impact for low-income populations, HUD and HCD have put into place numerous checks and balances, in the form of requirements and documentation. And because this is far from a perfect science, both HUD and HCD have changed methods repeatedly in order to correct inefficiencies and/or block against misuse of funds. But this has created layers of burden upon everyone who tries to implement CDBG.

So how to address this tension? How should HCD ensure that the state CDBG program is moving towards responsiveness to community priorities without overburdening the people who implement it and/or the end users themselves?

HCD acknowledges both that CDBG implementation practices must shift in order to be delivered accessibly AND that yearly changes are overly burdensome. So, HCD has been using a new model to implement changes and minimize the burden to Grantees in the long-term. The components of this approach are as follows:

- *Intentional community engagement: HCD is evaluating its policies and practices holistically, and focusing on shifts that address the roots of persistent service gaps and can be broadly applied across programs and communities (such as a centering of community engagement in program design).*
- *Responsiveness, rather than reactivity: HCD is engaging in bidirectional learning with Grantees so that it can be responsive to their needs and wisdom.*
- *Graduated shift with support: HCD is committed to designing a tiered implementation strategy that consists of an end goal and yearly steps towards meeting the goal. This will give the Grantee the long view and time to plan, as well as a choice to either go straight to meeting the end goal (if multiple shifts feels too burdensome) or step by step (if too much change, too quickly, is too difficult).*

GMM References

Chapter 2, Section 2.2.2 - Low/Mod Limited Clientele (LMC)

Chapter 9, Section 9.1 - Relocation and Displacement

Chapter 9, Section 9.2 - General Relocation Requirements under URA

Chapter 9, Section 9.7 - Relocation Assistance Requirements under Section 104(d)

PART V: ACCOUNTABILITY SYSTEMS

Introduction

Community Development Block Grants are meant to invest in the economic and overall well-being of low-income individuals and communities, by pushing resources towards the priorities and needs of these communities and the individuals who live within them.

The word accountability often elicits a punitive mindset, one that includes monitoring, catching wrongdoing, and rectifying noncompliance. And while accountability mechanisms ARE meant in part to hold entities responsible for keeping their promises, community responsive accountability is much more expansive than this.

A framework for community responsive accountability first and foremost is an asset-minded framework. It is based on the knowledge that the low-income community members served by CDBG Grantees are experts on their lives, their priorities, their needs, and the dignity-affirming ways that much needed services and resources can and should look within their community. The government, and in this case, the Grantee, has the power to and is responsible for pushing resources towards these community-driven priorities, and measuring success (and planning future shifts) based on assessments done by the low-income community members these dollars are meant to serve. All components of the accountability system should be framed through a lens of community responsiveness, co-design, self- and community-determination, robust support, and, when harm is created, of repair.

CDBG regulations include three mechanisms that are specifically aimed at creating the conditions for accountability to community and to achieving the mission of CDBG:

- *Data gathering and data analysis helps Grantees understand who their program is serving and who might be missing*
- *Monitoring and evaluation helps HCD and Grantees evaluate the success of their programs*
- *Feedback, complaints, and appeals give end users pathways to seek repair when their needs are not being sufficiently met by the program*

In the subsections below, we will discuss how to maximize these tools to support end users, Grantees, and the CDBG program as a whole in meeting the National Objectives and supporting low-income people and communities.

City of King Pro Youth HEART After School Program, Photo Credit: Steve Adams

Data Gathering and Data Analysis

CDBG grants are meant to invest in the well-being of communities and create economic stability for low-income people and communities in accordance with their priorities. In order for the Grantee (and HCD) to understand the extent to which this is happening, the Grantee must:

1. *Understand who is using their programs, and how that population aligns (or does not) with the people in their community that CDBG is intended to serve*
2. *Understand the extent to which the people participating in their programs are experiencing it as affirming of their dignity and responsive to their needs and priorities*
3. *Gather information and analyze it in a way that informs shifts to their current programs and improves program design in the future*

While Grantees are required to collect and report demographic data to HCD, these broader goals are not always achieved. Sometimes, Grantees can unintentionally make decisions surrounding data collection and analysis in ways that can erode trust with communities. Examples can include:

- *Collecting data and then failing to use it to inform programming decisions;*
- *Asking people for personal information that then gets misused or presented in a way that implies that community members are to blame for the challenges they face;*
- *Asking evaluation questions that only center the government's definition of success, and do not address community priorities; and/or*
- *Collecting data without offering community members the opportunity to provide feedback on contextualization.*

It is important to remember that data analysis is subjective, so intentional, community responsive measures are needed to better understand how to support communities experiencing persistent service gaps. In addition, it is important to share and present the data effectively in order to inform changes that will create improved and positive outcomes for the communities served.[25,26]

Spotlight: Using Data to Allocate Power in Decision-Making Processes

Upon reviewing County Census and homelessness data, a CDBG Grantee acknowledged that homelessness in their County disproportionately affected specific populations at a significantly higher rate than is represented in the general Census population. At the same time, the Grantee acknowledged a lack of internal data surrounding these populations, along with a lack of representatives from these groups with internal decision-making authority.

"Our community and the CoC [Continuum of Care] have identified the lack of data on who is being served and what populations are disproportionately experiencing homelessness… as a major gap in the homeless system of care. As a methodology for approaching this goal, the CoC is expanding Board membership with specific Board seats dedicated to ensuring that membership and voices at the table are represented by each group." — 2022 Community Priorities Survey

County of Imperial Seeley Fire Station and Cooling Center, Photo Credits: County of Imperial

A Strategic Approach to Data Gathering and Data Analysis

Research is a strong tool for addressing challenges and service gaps in communities and programs. It is especially important that there are intentional community responsive strategies for each phase of the process, including planning, analysis, synthesis, and presentation. When the Grantee is able to build an internal culture of learning and development, and one that centers low-income community members as experts, they can gain an accurate understanding of what is happening on the ground level, while earning the trust and buy-in from the communities they serve.

The first table below outlines the goal, the challenges, the overall strategic approaches, and the ways to measure success during the data gathering and data analysis process. This table is followed by three additional tables that take each Strategic Approach and break it down into concrete steps.

A SNAPSHOT: COMMUNITY RESPONSIVE APPROACH TO DATA GATHERING AND DATA ANALYSIS			
GOAL	Grantees create opportunities for meaningful participation and analysis in designing data and evaluation systems, to ensure the real stories, lives, and values of communities being served by CDBG are prioritized and shared.		
	1	**2**	**3**
CHALLENGES	Key demographics are not gathered or disaggregated to identify how people with different backgrounds or life circumstances experience program participation.	Program participants are not authentically engaged, and are either not invited to or do not feel supported to share their own stories and program impacts, in their own words.	Grantees lack transparent data gathering, analysis, and accountability systems that are informed by community priorities and lead to programming shifts.
ROOT CAUSES	Systems are not developed to gather and disaggregate key demographic information; and/or participants do not have the opportunity to self describe in a way that feels accurate or affirming to them.	Grantees may approach data gathering and analysis in a traditional way that extracts data, and/or does not acknowledge the limitations of the Grantee's perspective, inadvertently alienating participants and residents.	Participants are not directly engaged in building data, analysis, and evaluation systems; and/or trust has not been adequately built with residents and participants.
STRATEGIC APPROACHES	Systems and processes for data gathering and analysis are intentionally designed and implemented, so that the Grantee can have a better understanding about how their programs are being experienced by people with different backgrounds.	Systems and processes are developed and implemented that allow participants and residents to authentically tell their own stories, and ensure that the data is analyzed accurately and with dignity.	Engage community members served by CDBG in designing and implementing data gathering and analysis systems that center their priorities and values and lead to programmatic shifts.
MEASUREMENTS OF SUCCESS	A clear process for data gathering and analysis is implemented, including disaggregated data that is measured against local census data.	Program participants can share the impacts of programs and emerging needs in their own language and stories and reflect back that their data was reported accurately.	Program participants and residents engage in the design, analysis, and implementation of data and evaluation systems, and programmatic changes reflect community feedback.

City of King Pro Youth HEART After School Program, Photo Credit: Steve Adams

Why it Works

These approaches work because they ensure that data systems are grounded in what actually matters to the people programs are intended to serve, while still meeting federal reporting requirements. By engaging community members in designing accountability systems, defining outcomes, and contributing to data collection and interpretation, Grantees move beyond surface-level metrics and gain insight into how programs are directly experienced by the communities programs are designed to serve.

Intentional data systems that capture both quantitative and qualitative information—including differences across populations—allow Grantees to better understand who is being reached, who is not, and why. This helps identify service gaps, challenges in navigating programs, and uneven program impacts, which are often invisible in traditional data systems. As a result, data becomes a tool for community responsive decision-making, rather than simply a compliance requirement.

Incorporating community narratives and lived experience also strengthens the accuracy, context, and dignity of data. Participants are more likely to engage and share meaningful insights when they see their experiences reflected respectfully and used to inform real change. This leads to stronger trust, better data quality, and more relevant program adjustments. Ultimately, this approach works because it transforms data gathering and analysis from a static, compliance-driven task into a dynamic system for learning, feedback-loops, and continuous improvement—one that both satisfies CDBG requirements and drives more meaningful, community-centered outcomes.

The three tables below provide concrete steps to take (as well as examples, context, and reflection questions) to address these challenges strategically and reach the overall goal.

HOW TO: DESIGNING SYSTEMS FOR DATA GATHERING AND ANALYSIS		
Challenge 1: Key demographics are not gathered and/or disaggregated to identify how people with different backgrounds or life circumstances experience program participation.		
Strategic Approach 1: Systems and processes for data gathering and analysis are intentionally designed and implemented, so that the Grantee can have a better understanding about how their programs are being experienced by people with different backgrounds.		
ACTION STEPS	**CONTEXT & EXAMPLES**	**QUESTIONS FOR REFLECTION**
Data systems are developed to gather key demographics from community members who participate in their programs so that data disaggregation is possible.	▪ Intentional decisions are made to determine which demographic measures are most critical to gather in order to ensure broad understanding of the communities your programs are designed to serve. ▪ Some of these demographics are required in order to report to HCD, and some may be chosen based on the make up of your particular low-income community.	▪ Do you know who your participants are and how well they align with the demographic makeup of the low-income community in your local context? ▪ Who is showing up, and who is not? ▪ Which variables are most meaningful for understanding who your programs are reaching and how experiences may differ?
Data systems include options for participants to self-describe and/or choose all options that apply to how they may identify themselves.	▪ Engage residents or program participants in reviewing demographic questions before they are finalized, in order to ensure that options reflect how local community members describe themselves (through small listening sessions, pilot surveys with feedback, or advisory groups.) ▪ Consider a two-layer demographic structure that provides both standardized response categories (aligned with federal or state reporting requirements) alongside a self-description option where participants can write in how they identify. ▪ Allow "Select All That Apply" (avoid forcing people into a single category by allowing multiple selections, acknowledging the multiple layers of identity.)	▪ Have residents had the opportunity to offer input on how demographic options reflect (or don't reflect) the ways in which they describe themselves? ▪ Do your demographic questions allow participants to select multiple options and describe themselves in their own words when existing categories do not reflect who they are? ▪ Do your data systems balance standardized reporting requirements with opportunities for participants to describe their identities more fully? ▪ How are participant self-descriptions reviewed and incorporated into future updates to demographic categories? ▪ How do you protect people's privacy when analyzing and disaggregating data?

Intentional data analysis includes disaggregating data into key demographic variables that allow you to analyze how different people may experience program participation, service pathways, program outcomes, and levels of satisfaction.	▪ Break down participation, service pathways, and outcomes by key demographic variables to understand patterns across different groups. ▪ Compare program reach and completion across demographics to identify where participation may vary compared to census data. ▪ Review satisfaction and feedback data by demographic categories to understand differences in participant experiences. ▪ Use findings to inform adjustments in outreach, program design, and support strategies.	▪ Where do patterns suggest different participation levels, experiences, or results across groups? ▪ How are findings from disaggregated data informing program improvements or resource allocation? ▪ Are you consistently reviewing participation, outcomes, and feedback across these categories?
Be transparent about data collection purposes, practices, and security.	▪ Communicate what information will be gathered, why, and whom it will—and will not—be shared with. (For example: Collecting certain demographic data, such as family structure, can be (or feel) higher risk for some folks than for others.) ▪ Do not commit to data security if you are not able to actually keep it secure. Instead, be transparent about the protections that you can and cannot reliably offer. ▪ If you are required to share information gathered, ensure that you anonymize it first. (GMM Ch. 9, 9.1; Ch. 9, 9.2).	▪ Have you communicated to your participants in a transparent and honest way about how the data you've collected will (and will not) be used? ▪ Do you know who has access, and who does not have access to data collected? ▪ Can you separate names from demographic information that can pose a risk to communities if linked to participants' identity? ▪ Do you have a policy to destroy data once HCD has notified you that the record retention period is concluded for that grant year? ▪ Is digital data secure?

HOW TO: DESIGNING SYSTEMS TO ENGAGE COMMUNITIES IN DATA GATHERING AND ANALYSIS

Challenge 2: Program participants are not authentically engaged, and are either not invited to or do not feel supported to share their own stories and program impacts, in their own words.

Strategic Approach 2: Systems and processes are developed and implemented that allow participants and residents to authentically tell their own stories, and ensure that the data is analyzed accurately and with dignity.

ACTION STEPS	CONTEXT & EXAMPLES	QUESTIONS FOR REFLECTION
A range of both quantitative and qualitative data gathering techniques are implemented that allow participants to share their stories in meaningful ways.	▪ Narrative-based evaluation approaches such as storytelling, participant reflections, focus groups, and stakeholder interviews provide deeper insight into program impacts and help to illuminate perspectives that may not emerge through traditional methods. ▪ Open-ended survey questions allow participants to share feedback, experiences, and suggestions in their own words.	▪ Do participants have meaningful opportunities to share their personal stories and impacts beyond limited measures such as surveys? ▪ How are questions designed, and do questions encourage a range of responses and perspectives? ▪ Who is doing the facilitation in focus groups and reflection sessions and where are they taking place? Have you centered the priorities and feedback of the community members you are engaging when making these decisions?
Ensure data gathering and analysis methods consider the languages, backgrounds, and perspectives of the participants you are seeking to learn from.	▪ Data gathering tools (surveys, interviews, discussion guides) are translated and adapted so they are understandable in participants' languages and relevant to their lived experiences. ▪ Multiple ways to participate are offered (written responses, verbal conversations, small group discussions) so people can share feedback in ways that feel comfortable and familiar and that work for their schedules. ▪ Consult and collaborate with participants, partners and community leaders to ensure that your data collection tools resonate with the population you want to reach. (GMM Ch. 2, 2.5.10; Ch. 2, 2.2.2).	▪ Do your data gathering methods reflect the languages, communication styles, and lived experiences of the people participating in your programs? ▪ Who is involved in reviewing or shaping your questions to ensure they are understandable and meaningful? ▪ Are participants able to provide feedback in ways that align with how they naturally communicate and share experiences? ▪ Do participants feel empowered to share their stories? How do you know?

Present and share your findings in a way that effectively reaches and engages the people you serve, providing opportunities for participants to review the information (and for you to incorporate their feedback) to be included before reports are fully submitted.	▪ Hold participant reflection sessions to share key findings and engage in open conversations that allow participants to give feedback on the conclusions being made. ▪ Similar to initial engagement and data gathering steps, ensure these sessions are easily available and are aligned with how participants seek and receive information, as well as give feedback.	▪ How are you sharing and presenting information and why? ▪ Have community members been able to provide input on information being shared, to ensure their stories and perspectives are accurately represented? ▪ Have you set aside time to incorporate their feedback if changes to your analysis are necessary?

HOW TO: DESIGNING AND IMPLEMENTING ACCOUNTABILITY SYSTEMS IN ENGAGEMENT PROCESSES

Challenge 3: Grantees lack transparent data gathering, analysis, and accountability systems that are informed by community priorities and lead to programming shifts.

Strategic Approach 3: Engage community members served by CDBG in designing and implementing accountability systems that center their priorities and values and lead to programmatic shifts.

ACTION STEPS	CONTEXT & EXAMPLES	QUESTIONS FOR REFLECTION
Intentionally build trust over time with participants and low-income residents to ensure communities feel valued, seen and engaged in data gathering, analysis, and decision-making.	▪ Be humble and curious when framing questions and transparent about the purpose of data gathering, in ways that affirm end users and center their wisdom and lived experience. ▪ Consider allowing for anonymous feedback attached to demographic data, so that data can be disaggregated while ensuring the safety of the people giving feedback. For example, a participant can share their experience along with demographic information, without providing their name or any identifying details. ▪ Be aware of relationship dynamics that likely exist within the neighborhood or area being served, as well as the relationship between service recipient and service provider, and the impacts that these relational imbalances may have on data collection.	▪ Are you designing data gathering and analysis processes that allow the communities most impacted to have a role in making decisions about how their data is utilized? ▪ Are participants able to tell their own stories while experiencing physical and emotional safety? ▪ Are there multiple ways for communities to provide their feedback and demographic information based on their comfort level and relationship with you specifically and/or with government entities in general?

Commit to engaging communities your programs are designed to serve throughout the data collection process.	▪ Engage participants in shaping how data systems are designed, including what information is collected, how it is used, and how it informs program improvements. ▪ Once systems are in place and staff are trained to implement them, data gathering and analysis can become an integrated part of ongoing practice rather than a one-time effort—embedded in your culture of learning and improvement. ▪ Leverage relationships with CBOs and/or consultants to expand your capacity to engage in community driven data gathering and analysis.	▪ Who is informing your design process? ▪ Who is being left out? ▪ Is your staff prepared to engage in ways that are effective and oriented around community priorities? ▪ If not, or if you are already at capacity, is there anyone you can partner with in your local community who does community responsive engagement to support you in this process?
Provide support for data collection activities.	▪ Make sure to provide ample support to the community organizations and people on the ground collecting the data (GMM Ch. 11, 11.1).	▪ Are you asking partner organizations or subrecipients what support they need to do this work well? ▪ Are you taking on as much of the administrative burden as possible of data collection and entry?
Involve participants in the interpretation of the data.	▪ Create a data review committee made up of key stakeholders as well as your data analysis team, to reduce the likelihood that assumptions or subjective influence may lead to harmful conclusions and application of data. ▪ One way to do this is to ask participants during initial engagement whether or not they would like to participate further in the process of analysis, and then follow up with the folks who express interest.	▪ Does your analysis align with the experiences participants have expressed? ▪ Did participants have the opportunity to tell their own stories and to inform or lead the analysis of these stories?

Incorporate the data gathered into making meaningful changes to current programs and planning for future programs.	▪ Create intentional systems and space to match feedback up against current programs and look for places to shift so that the user experience can improve. ▪ Keep this feedback available for when you are designing future programs. ▪ Writing reports that sit on shelves and have no impact on the community members who supplied the data is a sure way to sever relationships with them and make them wary of participation. It can be hard to find time and figure out how to incorporate this, especially long after the fact, so intentionally building it into the process is key.	▪ Does your analysis align with the experiences participants have expressed? ▪ Did participants have the opportunity to tell their own stories and to inform or lead the analysis of these stories?

Spotlight: Disaggregation of Data

When gathering data on the people programs serve, evaluators face decisions about what to do with the data around members of smaller microcommunities, many of whom are the exact people CDBG programs are intended to serve. If Grantees or evaluators choose to lump multiple groups of people together, this process can contribute to erasure by obscuring distinct experiences and making it more difficult to identify specific needs or patterns across groups.[27] Others choose to omit data altogether, calling it statistically insignificant. Neither of these decisions are neutral or objective, and they can have real impacts on real people, whose distinct perspectives may be lost when combined with those of larger groups of people. In addition, when background demographics or neighborhood-based data is not collected or disaggregated, Grantees may miss critical indicators to inform program improvement. It is important to understand the various ways in which folks identify themselves, as well as privacy concerns that may come up when sharing or distributing data of a small or specific group of people.[28,29]

Understanding how communities and participants identify themselves is critical when disaggregating data because the impacts of programs may look different depending on what groups folks belong to. Ideally, participants have the option to self-describe and/or choose all options that apply regarding how they may identify themselves.[29] This practice offers a deeper and fuller look at your data, with more accurate results. It is important to be transparent with participants about why demographics are being recorded in a particular way, and offer additional space for folks to self-identify as necessary.[29] This will allow Grantees to be in compliance while simultaneously ensuring people feel seen as you conduct meaningful data disaggregation and analysis.

Monitoring and Evaluation

Monitoring and evaluation play a critical role in assessing potential service gaps, program impact, and ongoing improvement of CDBG programs. By intentionally developing community responsive monitoring and evaluation systems, a Grantee can gain valuable insights into how their initiatives are reaching and benefiting the communities they intend to serve. It is also the responsibility of the Grantee to interpret, analyze, utilize, communicate, and share this information in a way that will improve outcomes in alignment with the priorities of the low-income communities being served.

In order to provide this level of understanding, a community responsive monitoring and evaluation process must:

1. *Leverage monitoring practices as opportunities to provide support, guidance, and technical assistance for Grantees and contractors, in order to improve performance rather than to simply find faults.*
2. *Include an ongoing community responsive evaluation system that engages communities in evaluation design, utilizes user-friendly reporting, and includes meaningful and available feedback loops.*
3. *Focus on community-defined outcomes and the long-term impact on communities most impacted by persistent service gaps.*
4. *Ensure communities understand how their input will be integrated and will lead to meaningful programmatic improvements.*

CDBG regulations focus primarily on monitoring, ensuring that the money allocated for a funded project is being spent appropriately on an eligible activity that meets a National Objective. For example, federal cross-cutting regulations such as Davis-Bacon wages for construction projects and environmental review processes must be monitored and followed; and people who are being displaced must receive the information they need in a timely fashion and receive the financial assistance they are due. Subrecipients are expected to document their processes and Grantees are expected to monitor them. HCD monitors Grantees, and HUD monitors HCD (GMM Chapter 10; GMM Chapter 11).

However, Grantees can more effectively support the needs of their local, low-income communities if they design their compliance and monitoring activities alongside ongoing evaluation, with a focus on community responsiveness and improved outcomes.

Spotlight: Gathering Evaluation Data from Clients

"[Our] County seeks to hear the voices of communities [that experience persistent service gaps] on their thoughts regarding our current processes. It is only as the County and partner agencies make [these] voices central that they can undertake true change. Without [these] voices, the County and partners would be at risk of implementing [top-down] change, which would not engender the [fair and consistent treatment] being sought for the conduct of services. In terms of housing, [our] County has previously used a survey developed by the [local] Continuum of Care. In early 2021, using the survey as a template, [our] County and its partner agency, Community Action Partnership of [our] County surveyed 50 homeless or formerly homeless individuals in the county during the week ending January 15, 2021. Surveys were conducted with clients accessing services at [four of our programs]. Most of the clients surveyed stated they feel content, heard, understood, and are grateful for the services received." — 2022 Community Priorities Survey

A Strategic Approach to Monitoring and Evaluation

Framing this process as an opportunity to ensure that the low-income folks in your communities maintain their agency in deciding their futures via the outcomes of your programs can play a transformative role in your program and in the broader communities your programs are meant to support.

The first table below outlines the goal, challenges, overall strategic approaches, and ways to measure success during monitoring and evaluation processes. This table is followed by three additional tables that take each Strategic Approach and break it down into concrete steps.

A SNAPSHOT: COMMUNITY RESPONSIVE APPROACH TO MONITORING AND EVALUATION			
GOAL	Grantees are committed to community responsive monitoring and evaluation within their programs and implement systems, methods, and engagement efforts that ensure the voices, needs, and solutions of community members who experience persistent service gaps are represented and addressed.		
	1	**2**	**3**
CHALLENGES	Monitoring systems often focus narrowly on program completion and compliance, without equipping Grantees or subrecipients with the support and resources needed for compliance, improvement, and continuous learning.	Evaluation purpose and questions focus on outputs and/or required outcomes, while only relying on traditional methods such as surveys. Communities are not engaged in the design of evaluation systems, and therefore the evaluation often overlooks the lived experience and meaning participants assign to outcomes.	Evaluation processes frequently do not lead to meaningful shifts in current programs, nor do they inform future program improvements.
ROOT CAUSES	CDBG monitoring regulations are narrow in scope, and Grantees may approach monitoring systems as a process of "checking the box."	CDBG regulations do not give guidance on effective and holistic evaluation methods, and many Grantees may not have the infrastructure, training, or capacity to create a process from scratch.	Grantees lack the internal systems and experience necessary to develop and implement a community driven process for ongoing evaluation and programmatic shifts.
STRATEGIC APPROACHES	Develop a responsive monitoring system that aligns with the capacity and needs of Grantees and subrecipients, while providing support, guidance, and technical assistance to strengthen compliance (reducing findings and concerns) and promote ongoing program improvement.	Program participants are engaged throughout the evaluation process: defining evaluation questions and outcomes, reviewing findings, and identifying improvements. Evaluation methods intentionally center lived experience, contextual interpretation, and locally grounded knowledge.	Build organizational capacity and ongoing evaluation practices, ensuring your community responsive evaluation processes integrate the lived experience of community members, improve programs, and enhance long term impact.

MEASUREMENTS OF SUCCESS	Grant Administrators, Grantees, and subrecipients are in ongoing communication on progress and identify challenges as they arise. They receive genuine support if out of compliance, by identifying the root issues and resources or training needed.	Community members are actively involved in all phases of evaluation, including design, implementation, and reflection. Data collection and analysis for evaluation includes both quantitative and qualitative methods, ensuring participant's direct, lived experiences are represented in evaluation findings.	Staff receive training in community responsive evaluation, qualitative methods, and facilitation. Dedicated staff time and resources are allocated for ongoing evaluation practices, with regular reviews that inform program improvements.

Why It Works

These approaches work because they reframe monitoring and evaluation as ongoing, community responsive processes that support both compliance and continuous improvement. While CDBG regulations emphasize monitoring for financial and regulatory compliance, integrating community responsive evaluation ensures that programs are not only implemented correctly, but are also effective, useful, and aligned with community priorities.

By designing monitoring systems that are responsive to the capacity and context of Grantees and subrecipients, these approaches reduce administrative burden while improving compliance outcomes. Ongoing communication, technical assistance, and tailored support help identify and address challenges early—leading to fewer findings, stronger documentation, and consistent program improvements.

At the same time, engaging participants throughout the evaluation process—defining questions, interpreting findings, and identifying improvements—ensures that evaluation reflects lived experience, not just one-dimensional outputs. This allows Grantees and subrecipients to better understand how programs are accessed, experienced, and navigated, uncovering challenges or unintended harm that may otherwise go unnoticed.

Investing in internal capacity and long-term evaluation systems further strengthens this work by embedding learning, reflection, and adaptation into everyday operations. Evaluation becomes an iterative process that informs both current program adjustments and future program design. Ultimately, these approaches work because they align and integrate compliance, learning, and community voice into a single system—ensuring accountability requirements are met while also driving more responsive, effective, and impactful programs.

The three tables below provide concrete steps to take (as well as examples, context, and reflection questions) to address these challenges strategically and reach the overall goal.

HOW TO: DESIGNING COMMUNITY-RESPONSIVE AND SUPPORTIVE MONITORING SYSTEMS		
Challenge 1: Monitoring systems focus narrowly on program completion and compliance, without equipping Grantees or subrecipients with the support and resources needed for compliance, improvement, and continuous learning.		
Strategic Approach 1: Develop a responsive monitoring system that aligns with the capacity and needs of Grantees and subrecipients, while providing support, guidance, and technical assistance to strengthen compliance (reducing findings and concerns) and promote ongoing program improvement.		
ACTION STEPS	**CONTEXT & EXAMPLES**	**QUESTIONS FOR REFLECTION**
Intentionally design the purpose and scope of your monitoring system, ensuring federal compliance alongside opportunities for ongoing learning, program improvements, and enhanced community impact.	▪ In order to ensure your monitoring systems support Grantees and communities, prioritize trust and ongoing communication. ▪ Balance compliance with capacity-building: Design monitoring processes that meet federal CDBG requirements (e.g., they address hiring and salary policies, fiscal oversight, relocation regulations, and performance tracking) while also identifying where the entity being monitored may need support. ▪ Use monitoring data to inform program and community impact —not only compliance reporting.	▪ Are your monitoring processes designed primarily to identify compliance issues (such as findings or concerns), or do they also support learning, growth, and improvement for Grantees or subrecipients? ▪ How are you using information gathered through monitoring to improve program design and better respond to community needs—not just to meet reporting requirements?
Design monitoring and reporting processes that are user-friendly and integrate ongoing support.	▪ Reduce unnecessary administrative burden by simplifying and streamlining reporting processes, recognizing that overly rigid or complex requirements can divert time and resources away from community impact. For example, pre-populate or carry forward reporting data where possible to reduce repetitive reporting requirements. ▪ Site visits or reporting reviews can include space for coaching, troubleshooting challenges, and sharing best practices—not only assessing deficiencies.	▪ Are there small, concrete changes—such as streamlining forms or reducing repetitive reporting—that you could make to reporting processes that would ease the burden and support program improvements? ▪ What specific opportunities do Grantees or subrecipients have to receive support, resources, and/or technical assistance surrounding your compliance systems and process? ▪ In what ways do Grantees or subrecipients have opportunities to provide feedback on your monitoring processes and requirements?

	▪ Integrate regular feedback loops into monitoring, creating opportunities for Grantees or subrecipients to share their experiences with reporting requirements, program implementation challenges, and community needs.	
As much as possible, tailor the monitoring process (cadence, reporting method, document formats, etc.) to the specific capacity of the Grantee or subrecipient, as well as strengths, needs, and priorities of the communities your program is designed to serve.	▪ When possible, allow for multiple formats for reporting (e.g., written summaries, verbal check-ins, recorded updates, or site visits) alongside required compliance documentation. ▪ As much as possible, prioritize smaller sets of meaningful indicators specific to the program's intended outcomes, rather than extensive, low-value metrics. ▪ There is a lot of flexibility within the CDBG monitoring system, so, move away from "one-size-fits-all" monitoring by tailoring frequency, depth, and approach based on factors such as organization size, funding level, prior findings, and capacity. (This helps reduce unnecessary burden on smaller community-based organizations while still maintaining accountability.)	▪ How are you tailoring your monitoring approach to reflect the capacity, context, and needs of Grantees or subrecipients? ▪ In what ways are you aligning monitoring expectations with the realities, strengths, and challenges of the populations being served? ▪ Are your monitoring requirements supporting Grantees in doing their best work, or creating additional strain that may limit their effectiveness? ▪ How do you ensure that flexibility in monitoring does not compromise compliance, but instead strengthens both accountability and impact?
If you are a Grantee who is also being monitored by HCD, ensure your own internal self-monitoring processes are grounded in holistic documentation and ongoing communication.	▪ Maintain clear, organized, and accessible documentation systems, ensuring that program, financial, and compliance documentation is consistently updated, easy to navigate, and aligned across teams. ▪ Establish ongoing communication with your Grant Administrator, identifying issues early, aligning expectations, reducing last-minute challenges during monitoring or reporting periods, and asking for help as necessary.	▪ Do your internal systems allow you to clearly and consistently document program activities, decisions, and outcomes? ▪ How regularly are staff across functions (program, fiscal, compliance) communicating about implementation and challenges? ▪ Are you identifying and addressing potential issues early, or only during formal monitoring periods?

	▪ Use insights from HCD monitoring or internal reviews to inform adjustments, rather than treating monitoring as a one-time event.	▪ Are you asking for support and clarification from your Grant Administrator as needed? ▪ How are you using insights from monitoring (internal or external) to improve your processes and programs over time?
If a Grantee or subrecipient is out of compliance, ensure a supportive and meaningful process grounded in ongoing learning, that identifies: ▪ What is not working; ▪ What program shifts or improvements are required; and ▪ What support or resources are needed.	▪ Approach findings as opportunities for improvement, not just correction. When noncompliance is identified, work collaboratively with the Grantee or subrecipient to understand root causes—such as capacity gaps, unclear guidance, or resource constraints. ▪ Develop clear, actionable corrective action plans in collaboration with the Grantee or subrecipient. Beyond specific steps, timelines, and responsibilities, action plans should identify what support (e.g., training, templates, technical assistance) the Grantee or subrecipient needs to successfully resolve issues. ▪ Provide ongoing technical assistance and follow-up, maintaining regular communication to support progress, answer questions, and adjust approaches as needed. ▪ Consider any patterns of noncompliance across Grantees or subrecipients to inform system-level improvements you can administer as the monitor.	▪ When compliance issues arise, are you working to understand the root causes, or only addressing surface-level problems? ▪ What types of support or resources are you providing to help Grantees or subrecipients successfully resolve findings? ▪ Are your corrective action processes clear, realistic, and achievable for Grantees or subrecipients given their capacity? ▪ How are you using recurring challenges across Grantees or subrecipients to improve your overall systems, guidance, or training?

HOW TO: ENGAGING COMMUNITIES THROUGHOUT THE EVALUATION PROCESS

Challenge 2: Evaluation purpose and questions focus on outputs and/or required outcomes, while only relying on traditional methods such as surveys. Communities are not engaged in the design of evaluation systems, and therefore the evaluation often overlooks the lived experience and meaning participants assign to outcomes.

Strategic Approach 2: Program participants are engaged throughout the evaluation process: defining evaluation questions and outcomes; reviewing findings; and identifying improvements. Evaluation methods intentionally center lived experience, contextual interpretation, and locally grounded knowledge.

ACTION STEPS	CONTEXT & EXAMPLES	QUESTIONS FOR REFLECTION
Intentionally determine whose voices should be engaged in the evaluation process, based on who the program is designed to support and specifically community members who experience persistent service gaps.	▪ Engage Grantees and program participants (and additionally folks whom services are designed to support, but who have not participated) in the evaluation process. ▪ During data analysis, ensure participation from community members who experience persistent service gaps, including folks who experience unique challenges when entering or navigating programs. ▪ For example, the data may reveal that participants who are single parents have faced additional challenges in gaining or navigating entry points to housing assistance.	▪ Who is involved in shaping how evaluation activities are designed and carried out? ▪ Who do you need to engage to capture and apply learnings from these experiences and make this or future programs more effective and less harmful? ▪ How does someone's life circumstances impact their ability to ask for or receive support?
Tailor evaluation methods and activities to the specific circumstances, priorities, and lived experiences of the people your program is designed to serve.	▪ Engagement methods are adapted to the realities of participants' lives (e.g., meeting times, locations, language, childcare, transportation, or virtual options). ▪ Evaluation methods include narrative-based formats that feel comfortable and familiar to participants, such as focus groups, storytelling, participant reflections, stakeholder interviews, and/or participant journals. These methods can help surface perspectives that may not emerge through traditional approaches.	▪ How do you ensure your evaluation process reflects the real-life circumstances and needs of the people participating in your programs? ▪ Are there practical adjustments you can make that would make participation easier or more meaningful for participants? ▪ How can you engage your participants and residents in ways that feel inviting and affirming for them?

	▪ Grantees consult subrecipients, program participants, and/or local partners when designing evaluation activities to ensure methods reflect the priorities and circumstances of the people the program serves.	
Ensure your evaluation questions are aligned with the intended purpose and outcomes of the program.	▪ Go beyond tracking performance and outputs, to understand how the work is meaningfully affecting participants and communities. For example, when implementing Affirmative Marketing Plans and assessing marketing effectiveness and possible corrective actions, focus on the goal of participants gaining secure housing. ▪ Incorporate evaluation methods that surface qualitative insights, participant feedback, and community-defined indicators of success to better capture real impact. ▪ Include in your evaluation efforts an analysis of how people navigate and gain entry points into a given program. Include evaluation measures that consider participants' experience throughout the process (e.g., not only the number of housing applications submitted) (GMM Ch. 4, 4.3).	▪ Are you focusing on the ultimate impact, or only what is quickly and easily measurable? ▪ Whose priorities and definition of success are being centered? ▪ What questions can you ask to better understand the experience of navigating this program from the participant's perspective?
Ensure evaluation processes and questions are aligned with participants' language and background.	▪ Translate and adapt evaluation questions and materials so they are understandable and relevant to participants' languages and lived experiences. ▪ Offer multiple ways to participate (written responses, verbal conversations, small group discussions), so people can engage in ways that feel comfortable and familiar.	▪ Do your evaluation questions, methods, and process reflect the languages, communication styles, and contexts of the people your programs are designed to serve? ▪ Who is involved in reviewing or shaping your questions to ensure they are understandable and meaningful?

	▪ Consult and collaborate with participants, partners, and community leaders to ensure that your evaluation questions and methods resonate with the population you want to reach (GMM Ch. 2, 2.5.10; Ch. 2, 2.2.2).	▪ Are participants able to engage in ways that align with how they naturally communicate and share experiences? ▪ Do participants feel empowered to share their stories? How do you know?

HOW TO: BUILDING INTERNAL CAPACITY FOR COMMUNITY-DRIVEN EVALUATION		
Challenge 3: Evaluation processes frequently do not lead to meaningful shifts in current programs, nor do they inform future program improvements.		
Strategic Approach 3: Build organizational capacity and ongoing evaluation practices, ensuring your community responsive evaluation processes integrate the lived experience of community members, improve programs, and enhance long term impact.		
ACTION STEPS	**CONTEXT & EXAMPLES**	**QUESTIONS FOR REFLECTION**
Grantees and subrecipients establish organizational commitments to engage the communities programs are designed to serve throughout the evaluation process.	▪ Leverage your relationships with subrecipients and/or consultants to expand your capacity to engage in community responsive research. ▪ Work with community leaders and/or organizations to design a framework for a collaborative group, made up of Grantee and/or subrecipient staff, and community members who are the intended recipients of the program. ▪ Create a plan to include participants as well as people who are not yet being served by your program. ▪ Build and/or cultivate relationships with these community members, and co-design community agreements that would make collaboration with Grantee staff possible and productive.	▪ Whose voices are present and centered through your evaluation design and process? ▪ What voices are being missed, and why are they not engaged? How can you work to develop relationships with them? ▪ Are Grantee and subrecipient staff clear on the purpose and goals of community responsive evaluation? ▪ What do community members need in order to be fully supported to collaborate with Grantee staff?

Build internal staff capacity and organizational systems to support community responsive evaluation practices.	▪ Provide staff training in facilitation, qualitative data collection, community responsive evaluation methods, and reflective learning practices. ▪ Allocate dedicated staff time and organizational resources to support ongoing engagement, data collection, and evaluation. When additional staff time is difficult or limited, incorporate evaluation reviews and reflection opportunities into regular, ongoing staff meetings. ▪ Engage community partners and consultants as necessary, with the intent to integrate their expertise into the organization's leadership, staff, and ongoing practices. ▪ Remember that while you may be building this capacity as a part of your CDBG program evaluation, these are good practices to engage in throughout your programming, so that all of your funding is spent efficiently and in service of community priorities.	▪ Do staff have the time, training, and tools needed to meaningfully engage participants in evaluation processes? ▪ How are you building internal skills over time to facilitate dialogue, gather qualitative insights, and collaboratively interpret findings with participants?
Design an iterative evaluation process that includes continuous stakeholder feedback and offers ongoing opportunities for program improvement and learning.	▪ Regularly seek input from Grantees, participants, and partners to help inform potential service gaps and obstacles throughout the evaluation process and measured outcomes. ▪ Establish internal processes for regularly reviewing evaluation findings and translating insights into program improvements. ▪ Evaluation reports are not meant to "sit on a shelf." Before launching a new program or grant cycle, review prior evaluation findings to inform how shifts and improvements can be made in order to better support and impact prioritized communities. (GMM Ch. 4, 4.5).	▪ How do evaluation results intentionally inform the next steps of your program? ▪ Is what you implemented actually having the desired impact? ▪ Are evaluation insights regularly reviewed and used to inform program adjustments and decision-making? ▪ Have you built time in at the beginning of a new cycle to review existing data, so that you start heading in the right direction?

Evaluate not only program outcomes, but also the ongoing experience that participants have before, during, and after program implementation.	▪ Understanding how people experience the program while it is still happening can reveal important insights about how to establish trust, perform outreach, and enhance the overall effectiveness of program implementation. ▪ Some of these changes can be made on the fly! ▪ Track participant experience at key stages of the program (e.g., application, enrollment, participation, follow-up) to understand where processes or program navigation may be either supportive or difficult. ▪ Remember that high participation rates do not necessarily reflect a fair or positive process. Programs may achieve strong participation numbers while still creating confusion, frustration, or additional stress for participants. ▪ Incorporate short reflection questions, interviews, or feedback opportunities for participants that allow them to describe how the process has felt and what could improve it.	▪ Did participants feel respected, informed, and supported throughout the program? ▪ At what points in the process might participants experience confusion, stress, or unnecessary complexity? ▪ How might changes to program processes improve participant experience while still achieving desired outcomes?

Spotlight: The Power of Community Responsive Monitoring and Evaluation

Grantees have the opportunity to build a strong commitment to community responsive monitoring and evaluation by embracing these approaches as pathways to meaningful, positive impact in the communities they serve. By embedding human-centered, community-responsive practices into their work, Grantees can continuously generate valuable insights that support ongoing improvement and enhanced impact. Integrating these approaches into monitoring and evaluation systems helps move beyond "checking the box," and ultimately fosters more effective programs, stronger engagement, and healthier, safer communities.

GMM References

Chapter 4, Section 4.3 - Affirmatively Furthering Fair Housing (AFFH)

Chapter 4, Section 4.5 - Limited English Proficiency

City of King PRO Youth Program Photo Credit: HCD

Feedback, Complaints, and Appeals

The feedback, complaints, and appeals processes are in place to empower program users who are not having their needs met.

In order for that goal to be achieved, these processes must:

1. *Be safe and meaningfully accessible for program users to use*
2. *Be easy to navigate for people who may not have a lot of time or access to financial resources*
3. *Lead to repair, the restoration of relationship and connection, and project completion in alignment with the program user's priorities and needs.*

The baseline regulatory system around these processes makes this end goal inconsistent and, at times, difficult to achieve. Federal regulations related to complaints and appeals are often fragmented. Some components of CDBG and certain cross-cutting requirements reference complaints procedures, and specific regulations—such as the Uniform Relocation Act (URA)—include requirements when applicable. In most cases, however, Grantees are simply required to have a process in place should complaints arise. Local governments frequently direct participants to general municipal complaint systems, which may not fully address program-specific concerns or deeper issues raised by participants. Because federal guidance is relatively limited, Grantees have significant flexibility to develop more robust and responsive accountability systems if they choose to prioritize this area. Additionally, complaints and appeals processes often involve complex issues, including service gaps, structural challenges, and power imbalances between program administrators and participants. In many cases, the organization responsible for implementing the program is also responsible for reviewing complaints, creating a conflict of interest. Policies that effectively require participants who are low-income to seek outside legal counsel or navigate complex administrative procedures are unrealistic and can further perpetuate frustration and/or erode trust. Designing a fair accountability process therefore requires acknowledging this context, reducing the burden on participants raising concerns, and ensuring that complaints can be reviewed by individuals who are not directly involved in the issue being raised.[30,31]

Grantees have the power to develop clear and timely methods for addressing complaints and to ensure the infrastructure exists to meet this obligation. Complaints should be viewed as important forms of communication that can reveal gaps in services, unintended consequences of program design, or areas where trust may be eroding. Providing transparency and support around accountability processes helps ensure that participants understand how concerns will be reviewed and addressed. A human-centered approach to feedback, appeals, and complaints goes beyond simply enforcing rules or regulatory compliance. It focuses on addressing harmful practices and ensuring that the lived experiences of the people that programs are intended to serve meaningfully inform program improvements. In this approach, participants are not only able to raise concerns but can do so through processes that are transparent, accessible, and responsive.

A Strategic Approach to Feedback, Complaints, and Appeals

A human-centered accountability process ensures that feedback, complaints, and appeals are accessible, fairly reviewed, and used as opportunities for learning and improvement. The following strategies outline practical ways Grantees can strengthen their accountability systems and better support the people their programs are intended to serve.

The first table below outlines the goal, the challenges, the overall strategic approaches, and the ways to measure success during the feedback, complaints, and appeals processes. This table is followed by three additional tables that take each Strategic Approach and break it down into concrete steps.

A SNAPSHOT: COMMUNITY RESPONSIVE APPROACH TO FEEDBACK, COMPLAINTS, AND APPEALS			
GOAL	An effective and human centered accountability process is in place to meaningfully address negative experiences raised by the community members being served.		
	1	**2**	**3**
CHALLENGES	Feedback, complaints, and appeals processes are difficult for participants to access, understand, or navigate.	Feedback, complaints, and appeals lack an independent, third party review process.	Feedback, complaints, and appeals do not lead to programmatic changes.
ROOT CAUSES	Processes are often designed from an administrative perspective rather than the participant experience, resulting in procedures that are confusing, difficult to navigate, or not well communicated.	The people designing, implementing, and reviewing complaints processes are often the same people responsible for the programs themselves, limiting neutral perspectives and transparency.	Feedback, complaints, and appeals processes are treated (by the regulations and by Grantees) as one offs, issues to be handled between one participant and the Grantee, rather than as potentially indicating larger issues with program design.
STRATEGIC APPROACHES	Create multiple, easy to navigate opportunities for program participants to give their feedback when designing feedback, complaints, and appeals processes.	Create systems for independent, community, or partner oversight of feedback, complaints, and appeals processes.	Create procedures to integrate information from feedback, complaints, and appeals processes into valuable learnings about program design and improvements.

STRATEGIC APPROACHES	Participants understand how to provide feedback, raise concerns, or submit appeals, with multiple pathways for submitting feedback (verbal, cross language, written, online, through trusted partners).	Clear procedures exist for independent or partner review of complaints and appeals, and participants are informed about how concerns are reviewed and by whom. Participants feel safe raising concerns without fear of negative consequences.	Complaints and feedback are regularly documented, reviewed, and addressed transparently, while identifying any larger programmatic issues they may point to.

Why It Works

These approaches work because they transform feedback, complaints, and appeals from isolated administrative requirements into meaningful accountability systems that build trust, improve programs, and address conflicted interests. Designing processes that are easy to navigate, responsive to community members' realities, and available through multiple channels will ensure these processes reflect real-world needs and are utilized in a way that supports both programs and participants.

Creating independent or community-informed oversight helps address inherent conflicts of interest and power imbalances, increasing the credibility of the process and making participants more likely to come forward. When participants trust that their concerns will be reviewed fairly and without retaliation, accountability systems become more active, transparent, and effective.

At the same time, treating complaints and feedback as valuable sources of information - rather than one-off issues - allows Grantees to identify patterns, ongoing challenges, and gaps in program design or service delivery. Integrating this information into decision-making leads to continuous program improvement, rather than reactive problem-solving.

Ultimately, this approach works because it centers transparency, community needs, and responsiveness, ensuring that accountability systems not only meet basic requirements, but also repair harm, strengthen relationships, and improve outcomes for the communities programs are intended to serve.

The three tables below provide concrete steps to take (as well as examples, context, and reflection questions) to address these challenges strategically and reach the overall goal.

HOW TO: DESIGNING MEANINGFUL PARTICIPATION THROUGH FEEDBACK, COMPLAINTS AND APPEALS		
Challenge 1: Feedback, complaints, and appeals processes are difficult for participants to access, understand, or navigate.		
Strategic Approach 1: Create multiple, easy to navigate opportunities for program participants to give their feedback when designing feedback, complaints, and appeals processes.		
ACTION STEPS	**CONTEXT & EXAMPLES**	**QUESTIONS FOR REFLECTION**
Design complaints and appeals processes that are easy to navigate and safe for participants to use.	▪ Hold accessible public forums, listening sessions, or interviews with community leaders to understand how participants experience existing accountability systems. ▪ Engage community members in identifying obstacles that may prevent someone from filing a complaint or appeal. ▪ Consider obstacles such as financial costs, legal complexity, language access, transportation, or fear of retaliation. (GMM Ch. 9, 9.2).	▪ How can you better understand someone's experience navigating the appeals process when they have been harmed? ▪ Are entry points to the process easy to find? ▪ Is the process difficult to navigate? ▪ Do participants feel safe enough to begin the process? ▪ How do you know whether the process is and feels fair?
Involve impacted community members and stakeholders in designing accountability systems.	▪ Include individuals with lived experience and/or community organizations who work directly with the communities served, in designing accountability systems (such as relocation appeals or complaints processes.) ▪ Involve community members not only in design, but also in evaluating whether the process is working as intended. ▪ Gathering feedback after complaints or appeals are resolved can help identify ways to improve the system over time (GMM Ch. 8, 8.9; Ch. 9, 9.2; Ch. 9, 9.8).	▪ Do you have stakeholders from impacted communities involved in designing your accountability processes? ▪ Have you asked participants who have used the appeals or complaints system how it could be improved? ▪ If few people are using your accountability systems, have you asked why?

Share information about how to engage in feedback and complaints processes in ways that allow people to easily and meaningfully participate.	▪ Share information about opportunities to provide feedback or raise concerns in ways that directly reach the communities you serve. ▪ Bridge communication gaps by leveraging trusted relationships with community-based partners. ▪ Provide information in multiple languages and formats, including both digital and non-digital options. ▪ Ensure participants know how to navigate the process and use complaints or appeals systems before issues arise. ▪ Offer support for folks who are struggling to navigate it, and proactively advertise the support available.	▪ Do the people you serve understand how to raise concerns if they need to? ▪ Who is able to find and navigate this information? ▪ Are you sharing this information through trusted community partners? ▪ What can people do if they struggle to navigate your system? Do they know where to turn?

HOW TO: DESIGNING THIRD-PARTY SYSTEMS FOR FEEDBACK, COMPLAINTS AND APPEALS

Challenge 2: Feedback, complaints and appeals lack an independent, third party review process.

Strategic Approach 2: Create systems for independent, community, or partner oversight of feedback, complaints, and appeals processes.

ACTION STEPS	CONTEXT & EXAMPLES	QUESTIONS FOR REFLECTION
Involve impacted communities and stakeholders in developing a holistic and community-responsive approach to feedback, complaints and appeals across all of your programs.	▪ Include a range of stakeholders in designing these systems. ▪ Develop community agreements that clarify roles, participation, and shared expectations for decision-making. ▪ Center the voices of the people who may need to use these processes. Design it through their lens to improve usability. Then, overlay the Grantee lens to make sure that the system does not lead users to dead ends.	▪ Are the people your programs serve at the decision-making table in this process? ▪ Have you created a design system that prioritizes ease of use for participants, but also ensures that it aligns with Grantee processes, so that it functions smoothly?

	▪ Decisions and power are ideally shared and distributed rather than concentrated among program administrators.	
When possible, identify a third party to review the feedback, complaints, and appeals.	▪ When the entity responsible for implementing a program is also responsible for reviewing complaints, it can create a conflict of interest, whether real or perceived, which can prevent participants from using the system (GMM Ch. 4, 4.11; GMM Ch. 9, 9.1). ▪ Identifying a third party to review the information and hold decision-making power can encourage participants to come forward, because they are more likely to believe that they will be heard and less likely to fear retaliation. ▪ There may be partners in your community who do this sort of mediation work. Or, if it really is just up to you, see if you can find someone in your internal team whose role is not implementation, or create a panel of community members, etc.	▪ Do you have the flexibility in your process to identify someone else, other than the Grantee or subrecipient in charge of implementation, to review the feedback given by program users who are seeking restitution? ▪ Can you work to ensure that the person/entity that the complaint is in reference to is not running the review process? ▪ Can you work to anonymize the review, to minimize the chance (or the fear) of retaliation?
Include in your process a timely response for addressing complaints. Ensure that you have the infrastructure in place so that you can realistically meet this obligation.	▪ Establish clear and realistic timelines for reviewing and responding to complaints. Ideally, complaints are acknowledged and responded to within ten days of receipt. ▪ Participants should be informed of the expected timeline and next steps when they submit a complaint. ▪ If a response cannot be completed within the initial timeline, communicate updates and expected resolution dates so participants are not left without information.	▪ What infrastructure or staffing do you need in place to address complaints in a timely fashion? ▪ Are response timelines clearly communicated to participants? ▪ How do you ensure follow-up if additional time is required to resolve an issue?

Communicate transparently and often to program users about how they can access these processes, how they work, and how issues are resolved and communicated.	▪ Participants should be able to easily understand how to submit complaints, the steps involved, what support is available to them in the process, who will review, how decisions will be reviewed, and what timelines to expect. ▪ Provide this information in all locally spoken languages. ▪ Integrate explanations of the complaints process early in public engagement activities so participants understand the process from the beginning.	▪ Have you clearly communicated how to utilize your accountability processes? ▪ Have you made your processes easy to access, and in all languages spoken locally? ▪ Do participants understand what will happen after they submit a complaint?
Create mechanisms for independent or community-informed oversight of appeals and complaints.	▪ Establishing independent review mechanisms can help ensure fairness and credibility. For example, community advisory boards or trusted partner organizations may review appeals when relocation assistance is denied, helping assess whether the decision was fair and whether the participant received appropriate support. ▪ Independent oversight can also help identify patterns in complaints that point to larger structural issues within a program. (GMM Ch. 9, 9.8).	▪ Who outside of the program administration could help provide independent review or perspective? ▪ Is there a meaningful process that allows for critique and disagreement? ▪ How might community members or trusted partners participate in oversight of the complaints and appeals process?

HOW TO: UTILIZING FEEDBACK, COMPLAINTS AND APPEALS AS VALUABLE LEARNING OPPORTUNITIES		
Challenge 3: Feedback, complaints, and appeals do not lead to programmatic changes.		
Strategic Approach 3: Create procedures to integrate information from feedback, complaints, and appeals processes into valuable learnings about program design and improvements.		
ACTION STEPS	**CONTEXT & EXAMPLES**	**QUESTIONS FOR REFLECTION**
Shift the mindset to consider feedback and complaints to be important forms of communication that are both deeply personal and important AND can be understood more broadly.	▪ Any form of feedback is valuable for improving how programs operate. ▪ Complaints often highlight areas where processes unintentionally create service gaps, difficulty navigating programs, confusion, or harm. ▪ Ensure that feedback, appeals, and complaint systems are not isolated administrative functions but instead inform program design and improvement.	▪ Do you view complaints as a form of public input rather than simply a problem to manage? ▪ Do you communicate back to the person who submitted the complaint when changes are made based on their feedback? ▪ Do complaints submitted inform how you design or adjust your programs? ▪ How do you communicate the outcomes of complaints or appeals to the participants involved?
Create clear procedures to look at multiple complaints and other feedback over time to look for recurring themes that might point to broader issues in need of resolution.	▪ These procedures can be built into program evaluation and design processes already in place, even if these happen as part of larger meetings, such as staff meetings. Just make sure to set aside intentional time to look at these (such as in an agenda item). ▪ Anonymize stories and then bring them in as data points in addition to any program-wide evaluations that you are already doing. Consider these as the case studies that they are. ▪ Look at them alongside each other to identify themes. ▪ Look at them alongside program policies and practices to identify the source of the issue. Some may be the result of going against policy. But some may be the result of going with an inadvertently flawed policy.	▪ Do you track and review patterns in complaints to identify broader issues? ▪ Do you look at these patterns alongside your program policies to see if these negative experiences are the result of inadvertently flawed policy or of actions taken that are in conflict with policy? ▪ Do you have current program evaluation and/or design systems that you can build this into? Or do you need to create new ones? ▪ How do you communicate the connection between feedback and complaints and program shifts to the broader community?

	▪ Some programs publish summary data on complaints received and how they were resolved, helping build trust and accountability while also identifying areas for improvement (GMM Ch. 4, 4.11).	
Enlist a group consisting of community members served by CDBG and Grantee staff to do this work and make recommendations that lead to change.	▪ As mentioned earlier, your group will be most effective if it has a wide variety of expertise involved, including experience implementing government programs and experience participating in them. ▪ People with lived experience will have insight into how frequently such issues arise, how they feel, and what it would take to make repair. ▪ People with government experience will have insight into regulatory requirements and program bandwidth to ensure that recommendations are actually implementable. To this last point, make sure that the mission of the working group is to do everything possible to make these suggestions implementable. ▪ If you already have a group of community members engaged, you can integrate these processes into the mandate of that group. ▪ This is also a process that can be built into any oversight groups you have for program evaluation and future program design.	▪ Do you have a current group of people (or can you create one) that is made up of community members and government staff to combine expertise and drive change? ▪ What do you need in order to create one if you don't have one in place already? ▪ Do you have community partnerships and/ or relationships with community-based leaders to help set this up? ▪ What could the scope of work be that would improve your systems and programming all around with community responsiveness at the core?

Spotlight: Removing Obstacles to the Complaints Process

Complaints Procedures are a critical process to safeguard against unfair practices, policies, or harm within CDBG-funded programs, as well as a way to settle disagreements between the Grantee and the end user. Designing Complaints Procedures, however, requires deep intentionality in order to avoid unintentionally placing obstacles between program users and the process of receiving support and resolution.

HCD, ICF, EFC, and KW Consultants implemented an intentional process to finalize the current GMM Appendix 4-8, Sample Complaints Procedure. The changes made from the original version to the final version include the following:

- *Changing the word "grievance" to "complaint" to remove the undertone of resentment.*
- *Pointing people towards additional resources when the Complaints Procedure does not apply, rather than simply stating it does not apply. (Ex: Sending people with employment-related concerns to the California Department of Fair Employment and Housing.)*
- *Doubling the number of days (from 60-120) that a person has to file a complaint, which is a healing-informed strategy that understands trauma survivors may need more time to be able to report their experiences.*
- *Removing the Complaints Officer from the final appeals process, so that people do not view this person, who presumably has already rejected their complaint twice, as a reason not to bother with a final appeal.*

GMM References

Chapter 4, Section 4.11 - Complaints and Appeals Procedures

Chapter 8, Section 8.9 - Appeals

Chapter 9, Section 9.1 - Relocation and Displacement

Chapter 9, Section 9.2 - General Relocation Requirements under URA

Chapter 9, Section 9.8 - Appeals

PART VI: A FRAMEWORK FOR COMMUNITY RESPONSIVENESS

Introduction

The purpose of Community Development Block Grants (CDBG) is to be responsive to local communities' needs by infusing resources towards predominantly low-income areas and people to help them stabilize and thrive, providing safe and decent housing and neighborhoods, and expanding access to economic opportunities. This Toolkit provides a comprehensive community responsive approach to key aspects of the CDBG programs to support local Grantees in furthering CDBG's mission. This community responsive approach to CDBG rests on an ecosystemic view of the relationship between government institutions and communities. These relationships can at times be harmful, but they can also foster healing and well-being when community members are resourced to inform government programs, such as CDBG, including design, implementation, evaluation, etc. The principles and pillars of community responsiveness (which are described in depth in Section 6.4) can serve as guide posts when implementing the concrete strategies found throughout this Toolkit.

EFC Community Plaza Illustration

Grounding in Community Responsiveness: An Ecosystemic View

Community responsiveness rests on the idea that community members living and working together in a specific place and time may hold a variety of values, priorities, and ways of knowing and communicating that create unique micro communities within jurisdictions. These micro communities often have different needs and different levels of access to resources to meet their needs. Being community responsive, then, means proactively listening, trusting people to be experts on themselves, and pivoting to meet the need in ways that feel affirming and dignified to the community being served. This approach includes building deep and meaningful relationships with the actual people who make up the community, engaging in co-design with community members, and funding community priorities.

The Generative Nature of Harm

The Ecosystem of Harm

Humans live their lives within an ecosystem that includes other people, the built environment around them, institutions that they come into contact with (such as schools, hospitals, supermarkets, etc.), and, often invisibly, the broader structures that connect these institutions to each other. As folks try to live their lives in accordance with their values, the people, environment, institutions, and structures that they come into contact with have an enormous impact on

1. *Their experiences in general.*
2. *The challenges that they face to living a secure life in which their needs are met.*
3. *The availability of the resources necessary to overcome these challenges.*
4. *The extent to which their dignity is preserved and their priorities are respected in the process.*

For some people, and in some communities, challenges are fewer, resources are many, and dignity and priorities are likely to be respected. But for communities and community members who face persistent service gaps (who live in neighborhoods in which, for example, there are no health clinics, few healthy food options, and limited cross-walks), this is less likely to be so. These gaps do not exist because the community does not want or need these services. Rather, they are the result of disproportionate disinvestment by institutions, including the private sector and the government itself.

Looking at these gaps through an ecosystemic view requires seeing the sometimes invisible web between and among institutions that works to make economic and overall well-being elusive for some folks, regardless of the good intent of the people working within them.

EFC Ecosystem of Harm & Healing

For example, people who grew up experiencing poverty are much more likely to experience food and housing insecurity as adults.[13,32,33] This reality is impacted by many institutions, structures, and systems, which are layered and feed each other. For example, in the U.S. market economy, wage earners are expected to provide basic needs for themselves and their families, regardless of the fact that many full-time jobs do not pay enough to meet these needs and there is a very limited social safety net. So when folks are removed from the market economy one way or another (they get laid off, have a child, fall ill, etc.), or when they only have access to low-wage jobs and/or gig work, they lose access to stability mechanisms, such as wages and healthcare, and have difficulty feeding and housing their families. This is where persistent service gaps (versus service availability) can become especially calamitous, and can be accompanied by myriad negative outcomes. For children, one of these outcomes is that it hampers their ability to learn in school.[34,35] Meanwhile, education is purported to be the primary mechanism available to folks (especially given the lack of social safety net) to move up the economic ladder. And the cycle continues.

The harmful impact of experiencing persistent service gaps goes way beyond economics. The impact of food insecurity isn't limited to the rumbling of the stomach or the way that a lack of nutrients leeches focus. It is the chronic stress that comes with not knowing where your next meal will come from or whether or how you will be able to provide for the people who depend on you.[36] Prolonged exposure to economic instability has documented physiological consequences, including accelerated biological aging that people who aren't subjected to these ongoing threats do not face.[37,38]

The Ecosystem of CDBG

CDBG is an ecosystem that exists within this broader context, and when not treated as such, it can be to the detriment of communities served. For programs to qualify for CDBG funding, they have to meet a National Objective (see Appendix B, Section 1.1), be an eligible activity, and meet many federal cross-cutting requirements. But once these have been met, programs may often be created, funded, and evaluated on their own, rather than as a part of a larger ecosystem. Even within an individual program, the components can be systemically fragmented from each other by the compliance and monitoring system, appearing to be discrete requirements, divorced from the ways in which they inherently support and/or undermine each other.

Within one program, the ecosystem operates something like this: Program design should center the stated needs and priorities of the people who are best positioned to identify what works for them based on the impacts of their experience with persistent service gaps. However, engagement in the form of public participation plans—which require informing the public about engagement opportunities but does not ensure that the information lands—often involves a process in which engagement occurs too late to meaningfully shift the design of the program. Additionally, these meetings are most often advertised in places where a very small subset of community members, often the folks who are not experiencing persistent service gaps, learn about these opportunities. People who experience poverty are often overburdened in their lives already, by the amount of work that they have to do to keep their families fed and housed, and by the toxic stress that comes with insecurity around meeting basic needs.[34,35] They may not have time or resources to participate in public participation activities, and so they can't inform the programs that are aimed at supporting them. Once the program is created, they are then required to go through burdensome documentation-of-eligibility processes in order to participate in programming.[15,35,39,40] These documentation practices, if not intentionally designed to minimize burden, are most likely to push out the very people who need CDBG-funded services most.

Across programs, the history of government-funded community development demonstrates that providing federal investment does not always produce the intended outcomes for the communities it is meant to serve. Some programs may directly impact communities and cause displacement, which severs communities from each other and/or from services.[15,41] Some do so indirectly, such as when rising home values benefit current homeowners while negatively impacting renters and prospective homebuyers, leading to speculation from developers and/or from buyers from outside the immediate community who have more purchasing power[14] (See Appendix B, Section 4.3). Indirect displacement can happen when the program directly improves the state of the housing stock, when public facilities or services are added, or even when economic development programs raise the appeal or reshape the character of the downtown area.[15] Even when direct relocation is a part of the equation, this relocation is not fairly distributed, and the amends offered by the government are strictly financial, whereas the damage to community relationships and support is so much broader[15,16,41,42] (GMM Chapter 9).

In other words, programs impact the community as a whole, and as they address one need, they may actually exacerbate others. This does not mean that investment should be withheld. Rather, Grantees have the opportunity to reflect on the potential unintended outcomes of their programs, design programs with intentionality based in part on these reflections, and plan for future programs that mitigate the harms that past and current programs inadvertently create. For example, when designing a public facilities program that creates or significantly improves a neighborhood park, understand that improvements like this may raise property values (and therefore costs) in the long run. Procure companies that are owned and staffed by community members who are most vulnerable to swings in real estate value, so that they have the power to withstand these increases. Create payment schedules that are faster than typical federal and state government timetables so that these companies can afford to pay their workers (who, if they are low-income, likely live paycheck to paycheck) in a sustainable way. Of course, not everyone in the community will work for this company and benefit from this project directly in an economic sense. So, prepare for the future need for direct rental and homebuyer assistance so that folks who have lived in this community prior to the investment are able to stay. An ecosystemic lens paves the way for this kind of wraparound planning and program design.[43]

From Harm Towards Healing

The Ecosystem of Healing

This ecosystemic lens demonstrates that no single leverage point can fix the interlocking nature of persistent service gaps, and it points to a path forward. If harm is the result of a web of interconnected policies and practices, then changes across these multiple leverage points can build an alternative ecosystem of healing.

A Healing-Informed Lens

Healing-informed practices are active and intentional practices that dismantle and repair the damage caused by the harmful ecosystem described above. These practices go beyond conventional trauma-informed approaches that often focus solely on treating individuals and individual symptoms (relying on a victim narrative and a clinical, rather than communal, model of trauma). A healing-informed frame views individuals not merely as victims of trauma, but as agents of their own and their community's well-being. Thus, services that further community healing go beyond the economic bottom line.

Holding a healing-informed lens in this work in particular means turning the lens on CDBG programs and their requirements to find policies and practices that may overly burden, trigger, or retraumatize people who have experienced harm and shift these policies. This requires looking at all application processes, data gathering techniques, engagement strategies, documentation-for-eligibility requirements, program implementation, etc.[44,45] It means consistently examining perhaps flawed assumptions and expectations made about communities, their needs, and their capacity within the program design, implementation, and evaluation phases.

It also requires thinking about all decisions and decision-making processes through a community responsive lens: For people experiencing poverty, who may have had their data gathered without clear benefit to them, or misrepresented by institutions, demographic data gathering must be done in partnership with them so that it is aligned with their experiences and perspectives, transparently gathered and communicated, and geared toward informing and improving programs through the lens of the very people being served.[22,46-48]

Community Responsive Design

Community Responsive Design

Community responsive design is a process that allows design teams to operationalize healing-informed practices, both in internal and public-facing work. It begins with community-centered engagement (centering community members who experience persistent service gaps) and infuses engagement throughout the entire process: Engaging impacted communities in identifying the problems, dreaming of potential solutions, and evaluating the success of a program is the key.[22,49-51]

This design process moves through a cycle of (1) problem identification, (2) dreaming potential solutions, (3) grounding the dreams based on existing constraints, (4) generating a plan for operationalization, (5) implementing the plan, and (6) reflection and refinement. The cycle repeats again and again, with the acknowledgement that there is no perfect endpoint and that community makeup and needs and challenges morph over time. To this end, meaningful, community-centered engagement is an integral component of each step and each subsequent iteration of the process. In essence, community responsive design holds that the process is as critical as the outcome.

Process

Programs like CDBG are intended to help people build stronger and more resilient communities. Folks who choose to implement these programs as their career path generally do so because they care about the communities they serve and live in. In order to create the most meaningful outcomes, practices that center community responsiveness must be at the core of every level of planning, implementation, review, and engagement. The core of community responsiveness is not imposing solutions, but rather co-creating the solutions together for the betterment and well-being of the collective community. Putting this into practice and shifting long-standing processes, however, takes a lot of intention, reflection, and revision. At its core, achieving the mission of CDBG could be defined as a future where all individuals have access to opportunities and resources to thrive, while operating with the understanding that different individuals and community members face unique challenges which require tailored approaches in order to achieve community responsive outcomes.[52]

Many current service gaps stem from long-standing structures, policies and practices. The community responsive design process thus requires local Grantees to investigate how these continue to perpetuate the gaps communities are experiencing.[53,54] While persistent service gaps exist across and throughout the United States, the experiences, needs, knowledge, wisdom, and solutions of each community are context-specific, and so there is no single applicable roadmap to creating a community responsive program.[21,55,56] However, there are questions and considerations that we can ask and apply in order to guide the planning process towards community responsiveness. At every stage, planners can ask:

1. *What are the adverse outcomes this program is designed to address?*
2. *How are our current policies, practices, and programs maintaining, exacerbating, or mitigating adverse outcomes?*
3. *Who holds the experiences, knowledge, wisdom, priorities, and solutions that are needed to rectify these outcomes? Are these folks at the planning table?*
4. *How are we accounting for community co-design in the planning process?*
5. *How are we measuring success to ensure that our intentions are resulting in sustainable outcomes?*
6. *Who is accountable for what? And to whom?*

Measurement

Measuring community responsiveness can be a complicated task, and it requires dedicated resources to assess outcomes.

This is true when measuring the impact of a public-facing program, which requires moving beyond institutional-based ideas of success and incorporating metrics defined by the community members themselves.[55,57] This is also true when measuring internal systems such as human resources, which requires looking at pay scales, job descriptions, turnover rates, as well as the qualitative experiences of employees (including the folks who stay and the folks who leave), who themselves may be impacted by persistent service gaps.[21,57,58] Measuring community responsiveness can happen through intentional data collection that goes beyond traditional methods (See Appendix B, Section 5.2), community engagement and feedback, and tracking progress within programs and/or internal systems to identify and address persistent service gaps in order to allow all participants an opportunity to thrive.

Outcome

No one program is going to single handedly address all service gaps in its outcomes, and yet, a community responsive program can be a part of a larger solution. Community responsive outcomes are grounded in achieving overarching changes that positively impact the day-to-day lives of individuals and communities. Be it the ease with which folks can access forms and applications, how they are treated by staff, or how they are supported in receiving resources and services. These are all components of community responsive outcomes.

City of King Pro Youth HEART After School Program, Photo Credit: Steve Adams

Key Principles
For Community Responsive Design

Principle 1: Designing With Communities

Moving towards healing requires that Grantees reorient resources away from traditional ways of designing based on their assumptions about particular communities and towards designing with folks who are most impacted by persistent service gaps. Engaging these communities as co-designers is the key to transforming harmful structures and practices, because by centering the experiences, needs, wisdom, and solutions of the people who are most impacted, programs can directly alleviate the challenges these communities face, which is the purpose of CDBG.

PILLARS	PILLAR 1 *COLLABORATION AND COCREATION*	PILLAR 2 *PARTICIPATORY BUDGETING*	PILLAR 3 *IDEA INCUBATION*
EXAMPLES	Establish a community board/ committee made up of community members who face persistent services gaps, and engage in community responsive design. It is critical that this board have decision making power and be properly resourced.	Set aside grant funds for a community board/community members to vote directly on specific projects.	Set up a learning community where organizations, businesses, and community members can come together to learn and build capacity that sets them up to be able to participate in procurement processes. This can include technical coaching on policies like CDBG.

Principle 2: Trust & Relationship Building

For programs to have the highest level of impact, Grantees must transform how they orient toward communities, and how they engage them in processes. Engagement must move from one-time/short-lived efforts to long-term relationship building. Investing in engagement that is ongoing, evolving, and deepening with time builds stronger and healthier communities.

PILLARS	PILLAR 1 *COMMUNITY-BASED LEADERSHIP*	PILLAR 2 *COMMUNITY-DETERMINATION*	PILLAR 3 *TRANSPARENCY*	PILLAR 4 *HUMANIZING LANGUAGE*
EXAMPLES	Hire and train trusted community leaders as navigators to conduct year round outreach and engagement that meets communities where they are and honors how they feel safest engaging with an institution.	Sponsor neighborhood level gatherings or "Summits" that bring communities together around collaborative decision making, and places the Grantee as a guest in their communities.	Proactively communicate and make information available to communities in ways that are accessible to them (e.g., instead of simply publishing a 100 page report, move to a neighborhood scorecard where communities rate the impact of the Grantee's programs and services). Ensure the data is public, disaggregated, and communicates the impact on communities.	Shift language to center people's humanity and preserve dignity. This signals safety to communities, opening doors by allowing folks to see themselves in the programmatic audience.

Principle 3: Active Listening & Understanding

The key to relationship and trust building with communities who experience persistent service gaps is to listen to understand, not to react. Grantees must develop avenues to genuinely listen to communities and to use their feedback to change the structures that are creating harm.

PILLARS	PILLAR 1 ***COMMUNITIES AS EXPERTS***	PILLAR 2 ***INSTITUTIONS AS GUESTS***	PILLAR 3 ***EMBRACE COMPLEXITY***	PILLAR 4 ***COMMUNITY ACCOUNTABILITY STRUCTURES***
EXAMPLES	Communities are experts in their lives. Their knowledge and wisdom must be treated as such and elevated as a priority in making program design and implementation decisions.	Grantees must enter communities' spaces as guests and transition from telling to listening.	Communities are made up of folks who are shaped by many factors, not just their income. Listening to and understanding the complexity of their lived experiences is critical to designing programs that address the complex obstacles they are subjected to simultaneously.	Harm can be addressed through intentional repair practices. Whether the Grantee or its representatives (such as subrecipients) create the harm, restorative processes that go beyond punitive consequences need to be available to create repair with communities. Grantees may choose to use defederalized funds to establish a Community Reinvestment Fund.

Principle 4: Flexibility & Tailored Support

There is no "one size fits all" approach for communities. Instead, Grantees are guided by communities themselves to develop flexible and tailored supports that meet with their needs.

PILLARS	PILLAR 1 ***WHOLE-PERSON-WHOLE-FAMILY APPROACH***	PILLAR 2 ***NO WRONG DOOR APPROACH***	PILLAR 3 ***TECHNICAL COACHING***
EXAMPLES	Individuals and families face varied and complex realities that are interconnected. Programs that account for these realities are best positioned to create long term positive shifts within communities.	Communities' needs do not function in neatly fragmented ways. Grantees can best position support by having multiple entry points and warm hand off protocols, so that individuals and families can feel safe and assured knowing that support will be provided no matter where they seek it within the institution.	Grantees can support economic well being within communities by developing structures that provide coaching and capacity building for communities most impacted. Businesses can engage with Grantees through their hiring and procurement processes.

Principle 5: Fair Access

Community responsive design is only possible if the community members who experience persistent service gaps are able to actively and fairly participate in the process.

PILLARS	PILLAR 1 *HYPER-LOCAL IMPACT*	PILLAR 2 *TARGETED STRATEGIES WITHIN UNIVERSAL GOALS*	PILLAR 3 *ANTI-DISPLACEMENT BY DESIGN*	PILLAR 4 *RESOURCED ENGAGEMENT*
EXAMPLES	Communities experience different levels of access and varied obstacles to participation. An institution's focus on neighborhood level impact for communities facing persistent service gaps will create more access points.	Grantees can define universal goals, and, in order to meet those goals, can employ specific and varied strategies that work for community members facing persistent service gaps.	Healthy communities are anchored in having basic needs met, including safe, reliable, and stable housing within their community of choice. Grantees can develop protective measures to ensure communities have access to resources and are safe from the negative consequences of improvement projects.	Communities already facing deep strain in their lives must be resourced in order to have the ability and capacity to engage in institutional processes. Grantees can use defederalized funds (among other strategies) to provide stipends for their time on committees, providing professional childcare, and catering meals from locally owned restaurants.

Principle 6: Organizational Health

Community responsive work is internal as well as external. Ecosystems of harm permeate places of employment by way of unwritten norms and rigid policies that have wide ranging impact for employees, partners, and communities alike. Grantees have the opportunity to support healing if they do the work to address the ways in which individuals and communities interacting with them feel (un)safe, (under)valued, or (under)supported. A community responsive model of organizational health poses a path forward towards healing that is (1) rooted in community responsiveness and community-centered design practices, (2) focused on its north star, (3) nimble in response to evolving community demands, and (4) measures success by developing metrics for community accountability with community members themselves. Grounding the institution in these is key to avoiding inadvertently replicating harm both internally and externally.

PILLARS	PILLAR 1 *TRUST-BASED INFRASTRUCTURE & CULTURE*	PILLAR 2 *BUILD CAPACITY*	PILLAR 3 *PUBLISH PROGRESS*
EXAMPLES	Develop an internal infrastructure and culture that goes beyond service delivery and recognises the institution's active role in supporting community level healing and well being.	Ensure staff are on board, trained, and supported in working with communities most impacted as partners and engaging in genuine relationship building that engenders trust through action and care.	Create public facing tools that show the ways in which the institution is implementing structures, policies, and practices within its culture and programs to become more responsive to community needs.

Looking Beyond: Shifting Ecosystems

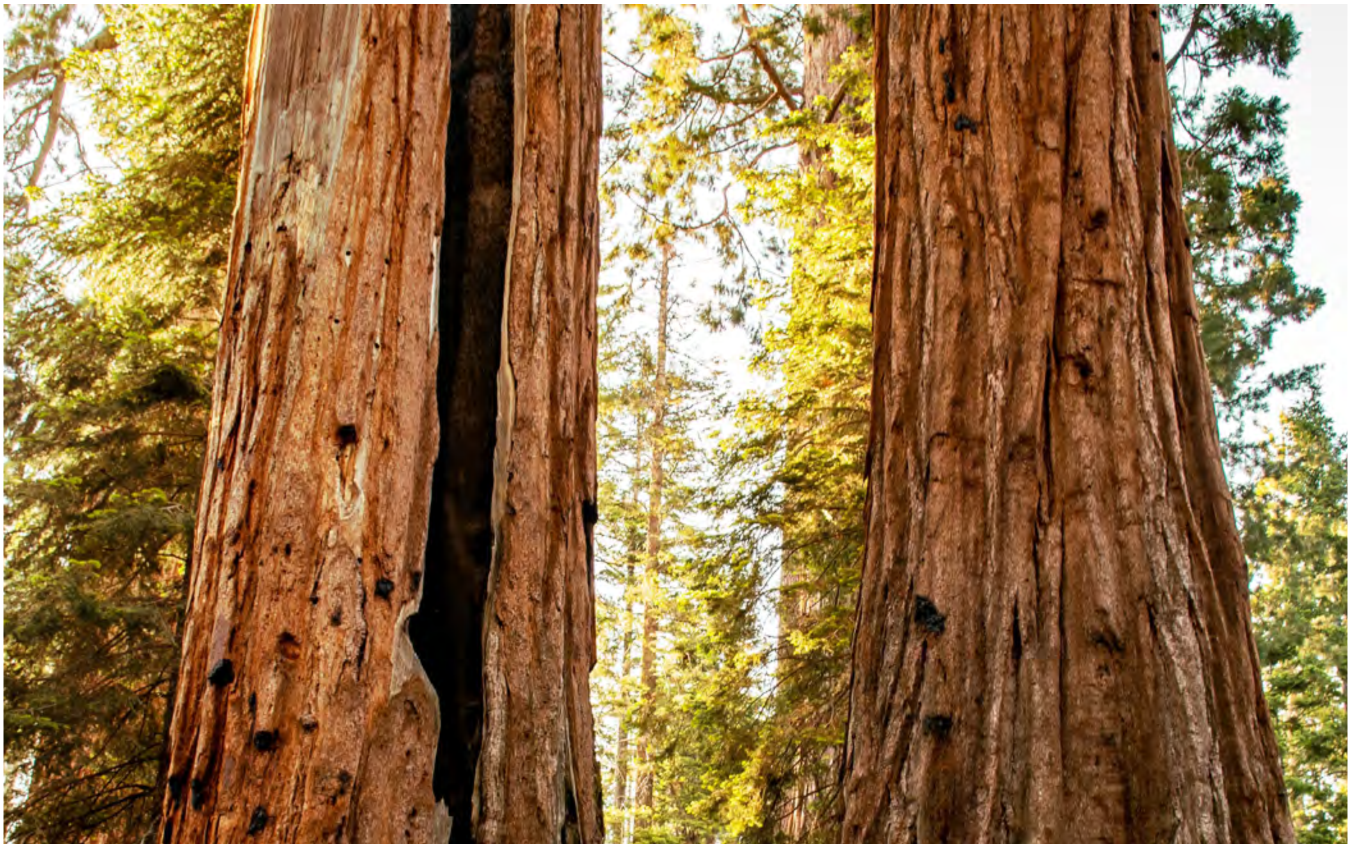
Institutions and the people who work within them (ranging from small rural jurisdictions to HCD itself) are uniquely positioned to promote ecosystemic change. When structural guardrails stand in the way of the dreams held within the institution, teams should approach these moments as opportunities to work toward broader, cross-agency change. If teams institutionalize "dreaming" and create space for aligning with community priorities, they can build longer-term strategies for structural change that will serve everyone within the ecosystem.

For example, at the state level, HCD does not, as of right now, have the power to make certain changes to its hiring practices if the desired shifts conflict with the California

Department of Human Resources' (CalHR) regulations. However, as a large and influential agency within the state, HCD does have the power to collaborate with other agencies and advocate for shifting the regulations in the long run. If the regulations are creating harm, HCD, in fact, has the responsibility to amplify that harm and push for needed shifts.

Likewise, when Grantees, municipal staff, HCD representatives (or, in the case of CDBG-CV, Grant Administrators (GAs) notice that broader policy beyond their control is creating harm, elevating their concerns up on behalf of the people they serve is imperative. For example, when seeing that multiple Grantees are struggling to create income documentation processes that reduce burdens for individuals and families seeking assistance, they can use feedback loops like office hours and surveys to explicitly name the challenges and proposed solutions, such as pooled resources at the state level. HCD then has the responsibility to provide technical assistance and resources to support Grantees.

In other words, wherever you find yourself positioned within this ecosystem, consider this: If someone is closer to the pain of the problem than you are (whether you are a Grant Administrator and your counterpart is a municipal employee; or if you are HCD leadership and you are hearing from Reps and GAs), you have a responsibility to put feedback loops in place, and listen to and amplify these experiences to the people with more power than you. Likewise, if you are closer to the pain of the problem (especially if you are employed within the ecosystem, and of course only when/if it is safe for you to do so), you have a responsibility to send calls to action up the chain.



PART VII: PROJECT STAGES

In their commitment to centering community priorities throughout the implementation of CDBG-CV, HCD partnered with consulting firms ICF, KW Consultants, and EFC. Together, these partners created a learning community, grounded in ongoing engagement, and featuring capacity building and technical assistance, strategic planning, and CDBG policy review and shift. The CDBG Toolkit: Strategies for Community Responsiveness is the culmination of this learning process, and is designed to support an ongoing commitment to community responsiveness in program design, implementation, and evaluation.

Stage 1: Ongoing Engagement

Ongoing engagement with the people who experience persistent service gaps and the people who work directly with these end users is key to understanding the obstacles that are in place and identifying solutions that can mitigate the harm they can cause. The goal of the initial engagement process conducted by HCD was to learn about how Grantees were already working to further community responsiveness in their CDBG implementation and to understand the questions they have and the resources that they needed to move this work forward. This took the form of two questionnaires sent to CDBG-CV Grantees, one sent out with the CDBG-CV 2/3 Notice of Funds Availability (NOFA) in December of 2021, and a follow-up survey in June of 2022. The second survey is referred to throughout this document as the "2022 Community Priorities Survey."

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

Parallel to this engagement phase, HCD and ICF staff participated in capacity building to (1) deepen their understanding about the way that policies and practices can create harm and/or can be used to disrupt it, (2) examine the ways that government in general and CDBG programs in particular have inadvertently created harm, and (3) seek ways to disrupt these patterns. These sessions made space for self- and collective- reflection and for bidirectional learning. In other words, participants learned frameworks and strategies, and the facilitators learned from participants about their experience creating policy, implementing programs, and/or administering grants, all of which informed this Toolkit. This work was bolstered by ongoing, as-needed technical assistance (which also included bidirectional learning) with people working to implement CDBG-CV-funded programs on the ground.

Stage 3: Strategic Planning

The work happening within the CDBG-CV program aligned with the larger priorities of the Division of Federal Financial Assistance (DFFA), and the team looked for ways to cross-pollinate, share strategies across teams/programs, and coalesce towards even greater (broader and deeper) impact.

DFFA leadership held a working session in October of 2022 to begin the process of identifying possible action steps based on the outcome of the 2022 Community Priorities Survey. In January of 2023, three listening sessions with DFFA program staff were held virtually to seek input on their dreams, growth opportunities, and solutions, and to get feedback on proposed policy shifts from DFFA leadership's working session. In February of 2023, DFFA leadership returned to listen to the dreams and reflections of DFFA program staff as gathered in the three listening sessions. They then took the themes from their initial working session and the listening sessions and began working within their teams on the development of Action Plans. The DFFA working sessions are collectively referred to throughout this document as the "2023 HCD Strategic Sessions."

Stage 4: Document and Policy Review and Shift

Throughout the partnership, HCD, ICF, KW Consultants, and EFC worked together to review and update the Grants Management Manual (GMM) to make it easier to understand and apply, center responsiveness, support communities most impacted by persistent service gaps, and align CDBG's actual practices more closely with the mission of CDBG. It was during this review process that the need for this Toolkit became clear.

HCD, ICF, KW Consultants, and EFC came to agree that there were some topics that needed to be addressed in longer form than what was possible within the GMM chapters. Additionally, the GMM is fragmented into sections that align with the various components of grant administration and compliance. Such fragmentation can be useful in a reference document, but it is not built to hold the community responsive framework required to pave pathways to healing. For example, relocation and displacement can happen as a direct or indirect consequence of many different programs and have ramifications far beyond economic impact. And so, it became evident that there was a need for a space to talk about this ecosystem connecting the fragmented parts of the GMM, to examine the interactions between CDBG and the wider context, to get curious about what it could look like if CDBG was a healing tool, and to provide tools and amplify learnings from the work happening on the ground.

Stage 5: Infusing the Learnings into the Toolkit

The journey described in Stages 1-4 is how we landed here, writing this Toolkit with and for the people who are closest to the pain of the problem, and who are closest to the solutions,[50] but are also often the furthest from institutional power. This Toolkit is a humble offer of loving support to the people who are working hard to serve their communities, and who seek strategies, tools, and/or deeper understanding to authentically do so; to the people who are creating policy and seeking ways to mitigate and prevent harm, but who may not yet have the information and strategies that they need to do so; to the planners and implementers who may or may not yet know why or how to co-design programs with communities that experience persistent service gaps. In an overarching sense, then, this Toolkit is a return home to the stated purpose and the values of the CDBG program.

CONCLUSION

The CDBG Toolkit: Strategies for Community Responsiveness was the culmination of an intentional partnership between HCD, ICF, KW Consultants, and EFC, grounded in deep and mutual respect for each other's expertise and skill sets. Its foundation was the understanding that much like within any ecosystem, we were interdependent, and were intentional in shifting away from the siloing that tends to happen in projects like these. HCD, ICF's Program Manager, KW Consultants, and EFC embraced the at-times uncomfortable and hard conversations that came with doing community responsive work, and embraced a healing-informed lens that did not aim to shame but rather to foster growth, learning, and evolution. This was possible because we centered communities, and worked to honor them through each step of the process.

KEY TERMINOLOGY

Administrative Burden

The time, effort, paperwork, and navigational complexity that people must take on in order to access services, comply with grant requirements, and/or participate in public processes. Administrative burden is often not evenly distributed; falls hardest on people with the fewest resources; and can function as an obstacle for community members and for Community-Based Organizations. Reducing administrative burden through plain-language materials, simplified applications, technical assistance, reduced documentation-for-eligibility, language support, and partnering with trusted community partners are direct ways to make programs and processes more accessible.
(5.2 Data Gathering and Data Analysis; 5.3 Monitoring and Evaluation)

Accountability

The practices and structures by which institutions are responsive to the communities they serve, demonstrating that commitments have been honored and that resources, decisions, and outcomes align with what was promised. Accountability is an ongoing relationship that requires transparency about decisions and trade-offs, clear ways for community members to raise concerns and see them addressed, and a willingness to share results and apply feedback and learnings from complaints and appeals to improve programs.
(Part 5: Accountability Systems)

Anti-Displacement by Design

A design principle calling on Grantees to anticipate displacement risks and build in protective measures from the start, rather than addressing displacement after the fact. The principle recognizes that healthy communities are anchored in stable housing within the community of choice, and that improvements (new parks, infrastructure, public facilities) can raise costs and push out the very residents the project was meant to benefit. Anti-displacement by design includes strategies like pairing investment with rental assistance, hiring locally so benefits remain in the community, and putting supports in place before residents feel pressure to leave.
(6.4: Key Principles for Community Responsive Design, Principle 5: Fair Access).

Bidirectional Learning

A process in which both parties in a relationship learn from one another, rather than one side only transmitting information and the other only receiving it. Bidirectional learning shows up in many contexts: between trainers and trainees; government agencies and the communities they serve; and between HCD and Grantees. Bidirectional learning relies on each party (but specifically the party holding traditional forms of power) respecting each other's wisdom and expertise and being willing to be shaped by what the other brings. In the Toolkit, bidirectional learning is at the foundation of technical assistance, capacity building, and engagement, where the goal is not only to deliver expertise but to gather it.
(7: Project Stages, 5.3: Monitoring and Evaluation).

Co-Design / Co-Designers

An approach to designing programs, services, processes, or physical spaces in which community members are partners in shaping the work from the start, rather than recipients consulted after key decisions have been made. Co-designers are community members who hold real influence over the design itself, including what gets built, how it works, how it is resourced, and how success is defined. Co-design requires institutions to share decision-making authority, build in time and compensation for community partners, and remain open to outcomes that look different from what they would have produced on their own.
(5.2 Data Gathering and Data Analysis; 5.3 Monitoring and Evaluation; 5.4 Feedback, Complaints, and Appeals)

Community Agreements

A collectively created and agreed-upon set of practices that help everyone in a group feel comfortable and supported to participate freely. Community agreements are typically developed at the start of a working group, meeting series, or collaborative process, and may cover things like how the group approaches disagreement, distributes airtime, listens to one another, and handles confidentiality. Building agreements together rather than imposing them tends to lead to stronger buy-in and shared ownership of the space.
(2.2: Engagement)

Community Hubs

Community Hubs may be groups, organizations, physical spaces, online communities, and other public or community-based locations where people naturally gather to build relationships and share information. Engaging through community hubs allows Grantees to reach people in settings that already feel familiar and trusted, rather than asking community members to come to government settings that may feel unfamiliar or unwelcoming. Effective hub-based engagement requires building real relationships with the people who lead, facilitate and gather at these locations, and respecting that some hubs may be considered sacred or otherwise not appropriate for government presence.
(2.3: Marketing, 3.4: Subrecipient Selection).

Community-Based Leader (CBL)

A person who holds influence, trust, and relationships within a specific community and who works to advance that community's priorities, often outside of formal institutional roles. Community-based leaders may be longtime residents, faith leaders, small business owners, organizers, promotoras, or anyone else who is recognized by their neighbors as people who get things done, who have their finger on the pulse of community priorities and needs, and who can be trusted. Their legitimacy comes from long-standing presence, lived experience, and the relationships they have built over time, and engaging them is often essential to meaningful, community responsive work.

Community-Based Organization (CBO)

A nonprofit or grassroots organization rooted in and accountable to a specific community, typically providing services, advocacy, organizing, or programming shaped by that community's priorities. CBOs vary widely in size and structure, from all-volunteer neighborhood groups to established nonprofits with paid staff, but what defines them is their grounding in a specific community and their relationships with the people who live there. When institutions partner with CBOs meaningfully, including with appropriate compensation and shared decision-making, these partnerships can strengthen both the process and the outcomes.

Community-Defined Outcomes

The results, changes, or conditions that community members themselves identify as meaningful, important, and valuable, rather than outcomes defined primarily by funders, agencies, or program developers. Community-defined outcomes often include dimensions that traditional metrics miss, such as relational wellbeing, community continuity, sense of belonging, or trust in institutions. Centering community-defined outcomes in program design, evaluation, and reporting shifts power toward the people most affected by the work and produces a fuller picture of whether programs are actually serving the communities they intend to.
(5.3 Monitoring and Evaluation)

Community Engagement

The ongoing process of building relationships with community members so that their wisdom, priorities, and lived experience meaningfully shape decisions that affect their lives. Community engagement exists on a spectrum, from one-way information sharing to genuine co-creation and shared decision-making. When engagement stops at informing or consulting, it rarely results in meaningful change. When it moves toward collaboration and shared ownership, it becomes a foundation for more responsive and effective work.

Community-Informed Decision Making

A decision-making approach that draws on community knowledge, experience, and priorities to shape the choices institutions make. This, too, exists on a spectrum. At one end, community input is gathered and considered alongside other factors. At the other end, community members hold formal decision-making roles. Community-informed decision making is most meaningful when it is built into a process from the start, when community members can see how their input shaped the outcome, and when institutions are transparent about the constraints and trade-offs that influenced the final decision.

Community Reinvestment Fund

A mechanism, often funded with defederalized dollars, that allows Grantees to invest in repair and reinvestment in communities that have been harmed by past or present programs and policies. Such a fund is named in the Toolkit as one tool within a broader practice of community accountability and restorative repair, where harm acknowledged through community feedback can be addressed through tangible, ongoing investment rather than only through formal corrective action. A community reinvestment fund works best when communities themselves have a meaningful role in deciding how the fund is used.
(6.4: Key Principles for Community Responsive Design, Principle 3: Active Listening and Understanding).

Community Responsiveness

The practice of designing programs, services, and decisions in ways that reflect what a specific community has identified as meaningful, needed, and appropriate. Responsiveness requires listening before planning, adapting based on what is heard, and remaining accountable to community priorities as conditions and relationships evolve. Community responsiveness is distinct from outreach or one-time input gathering; it is an ongoing orientation that treats community members as experts in their own lives and recognizes that no two communities are the same.

Community Voice

The collective expression of a community’s experiences, priorities, and ideas that are heard, taken seriously, and drive decision-making. Community voice is more than the sum of individual voices; it reflects shared concerns, shared knowledge, and shared aspirations that emerge through relationships, organizing, and ongoing conversation within a community. Hearing and being responsive to community voice requires institutions to create the conditions for collective expression through trusted partnerships, in-language engagement, and structures that facilitate collaborative discussions.

Continuous Improvement

An ongoing practice of reflecting on how something is working, identifying what could be better, making changes, and assessing whether those changes had the intended effect. Continuous improvement treats programs and processes as evolving rather than fixed, and creates structured opportunities to learn from experience, including from mistakes. In a community responsive context, continuous improvement depends on feedback from the people most affected by the work, and on a willingness to make real changes in response to what is heard.

Corrective Action Plan

A documented plan, developed when a Grantee or subrecipient is found to be out of compliance, that outlines the steps, timelines, and responsibilities required to resolve the issue. The Toolkit recommends that corrective action plans be developed collaboratively with the entity being monitored, identify the root causes of the noncompliance (such as capacity gaps, unclear guidance, or resource constraints), and specify what support, training, or technical assistance is needed to successfully resolve the issue. Done well, a corrective action plan strengthens the work; done poorly, it adds burden without addressing the root of the problem.
(5.3: Monitoring and Evaluation)

Decision-Making Authority

The formal and informal power to make choices that shape outcomes, including who participates, how resources are allocated, what gets prioritized, and what counts as success. Decision-making authority is often concentrated in institutions and the people who work within them, even when those decisions affect communities most. Shifting decision-making authority toward the communities most impacted by a decision is a central element of a community responsive practice. This can take many forms, from advisory roles with real influence; to formal seats at the decision-making table; to community-led governance structures.

Defederalized Funds / Defederalized Program Income

Funds that originated as federal CDBG dollars but, through program income mechanisms, are no longer subject to the same federal restrictions. Because federal regulations make direct compensation (such as cash or gift cards) to community members difficult by treating them as “income payments,” defederalized program income is one of the few CDBG-related funding sources that Grantees can use to compensate community members for sharing their expertise and time during engagement. Using defederalized funds for stipends, food, childcare, or other supports during meetings is a practical strategy for making meaningful participation possible.
(2.2: Compensating Community Members)

Disaggregated Data
Data that has been broken down in order to understand how people in different situations experience the same program. For example, a program evaluation may report that, in the aggregate, 70 percent of participants were satisfied; but disaggregating by age may reveal that satisfaction was significantly lower among elders or youth. Disaggregating data gives institutions the opportunity to identify where outcomes are uneven and where resources should be directed to address those gaps.

Displacement
The forced or pressured movement of people, households, or businesses out of a neighborhood or community, as a result of rising costs, redevelopment, policy decisions, condemnation, foreclosure, eminent domain, or environmental conditions. Displacement can take physical form (people losing their homes), economic form (people priced out of their neighborhoods), or contextual form (the conditions that made a place feel like home are no longer present, even for those who remain). While displacement can be the direct result of a single event (such as in foreclosure or redevelopment of a lot), it is often the cumulative outcome of policy choices, market forces, and patterns of disinvestment or reinvestment that play out over years or decades.

Due Diligence
The reasonable steps an organization takes to satisfy legal or regulatory requirements, verify information, and reduce exposure to risk before making a decision or entering into an agreement. In a CDBG context, due diligence applies to areas like procurement, subrecipient selection, and contracting, where Grantees are responsible for confirming that partners can meet program requirements in a community responsive and non-exploitative way, and that funded activities will serve the people they are intended to support.
(Section 3: Workforce Relations)

Economic Displacement
A process of neighborhood change in which rising property values, new investment, and the in-migration of higher-income residents lead to the displacement of longtime, often lower-income residents and the overall transformation of the area. Economic displacement is often discussed as if it were a natural market process, but it is shaped by public and private decisions: zoning changes, infrastructure investment, lending practices, and tax incentives. While new investment is not inherently harmful, economic displacement becomes harmful when it occurs without protections for existing residents and businesses, leading to displacement and erasure.

Eminent Domain
The power of the government to take or condemn property for "public use," without the landowner's consent, upon paying just compensation (as determined by the government). This power has a long history of being used unfairly. The most widespread use of eminent domain was in the building of the interstate highway system, which facilitated the large-scale shift of wealthy and/or middle-class communities from cities into suburbs, while eviscerating the tax bases of (and service provision for) low-income communities in the cities.

End User

The community member or household who receives the direct benefit of a CDBG-funded program, such as a new homeowner, a tenant in rehabilitated housing, a participant in a public service, or someone using a public facility. The Toolkit uses "end user" intentionally to keep the focus on the people the program is meant to serve, while also noting that end users often hold the most important expertise about whether a program actually works. Decision-making structures that exclude end users from program design tend to produce programs that miss what end users actually prioritize and need. (3.2 Procurement; 3.4 Subrecipient Selection; Section 4 Program Design)

Erasing/Erasure

The removal of communities and/or their distinct imprint from a neighborhood. While displacement is typically understood as the physical relocation of one person or population by another; erasure refers to the removal of not only the people, but the characteristics of the community, such as specific music or sounds of the neighborhood; ways of interacting with neighbors; attire sold and worn within the community; font and language of signage; street art, or additional public art forms, etc. Such erasure exists within a deeply harmful cycle: The erasure makes it easy to strip communities of agency and standing in decision-making practices. In turn, this removal of agency facilitates further erasure and, at times, physical relocation.

Fair Access

The conditions under which all community members, particularly people who experience persistent service gaps, can meaningfully participate in programs, processes, and decisions that affect their lives. Fair access goes beyond simply opening the door; it requires recognizing the obstacles that limit participation (such as geography, language, time, transportation, childcare, or familiarity with government processes) and addressing them through deliberate program and process design. In a CDBG context, fair access is foundational to community responsive design, because programs cannot be shaped by community priorities if community members cannot fully participate in shaping them. (6.4: Key Principles for Community Responsive Design)

Feedback Integration

The practice of taking in feedback from community members, partners, and participants and using it to shape decisions, adjust programs, or change course. Feedback integration is what distinguishes meaningful feedback collection from extractive or performative feedback collection: it requires institutions to close the loop by showing what was heard, what was done in response, and (when applicable) why certain feedback could not be acted on. Without integration, feedback collection can erode trust by signaling to community members that their input does not actually shape outcomes and is only being collected to check a box.

Feedback Loops

Structured, ongoing mechanisms through which information flows back and forth between institutions and the communities they serve, allowing each side to learn from and respond to the other. Effective feedback loops are bidirectional, regular, and connected to action; they include channels for community members to raise concerns and ideas, processes for institutions to consider and respond to that input, and ways of communicating back what was done as a result. Without feedback loops, programs can drift away from community needs even when they were initially well-designed.

Gatekeeping

The act of limiting or controlling the flow of information, power, money, or resources so that some people have meaningful access while some do not. Gatekeeping can be intentional or unintentional, implicit or explicit. For example, gatekeeping shows up in procurement opportunities as minimum requirements for experience working on government contracts. Federal regulations acknowledge that low-income people who own businesses have lacked access to such contracts (which is why Grantees are required to do outreach to Section 3 businesses. But embedding past government experience in Requests for Proposals/Qualifications (RFPs and RFQs) doubles down on reinforcing these obstacles.

Healing-Informed

An approach to designing and implementing programs, processes, and engagement that recognizes the harm many low-income community members have experienced with institutions, and intentionally works to mitigate that harm. Healing-informed practice includes creating spaces that feel emotionally and physically safe, allowing for multiple ways of communicating, being transparent, and approaching uncertainty with care, while staying mindful of moments that may be retraumatizing (such as burdensome data collection or intrusive questions). The aim is not only to avoid further harm, but to support trust and well-being over time.
(2.2: Engagement, 4: Program Design, 8: Conclusion)

Lived Experience

The direct, personal knowledge that comes from living through a particular condition, situation, or system, such as poverty, displacement, incarceration, or navigating a specific service. Lived experience is a form of expertise that is distinct from, and as critical as, professional or academic expertise. Because this expertise is embodied, contextual, and nuanced, it is impossible to become an "expert" in someone else's life and experiences. Centering lived experience in program design, governance, and decision-making produces better-informed work and shifts power toward the people most affected by the systems being addressed.

Meaningful Participation

Participation that is structured to allow community members to genuinely influence decisions, rather than participation that is symbolic, performative, or limited to providing input after key choices have been made. Meaningful participation requires accessible formats, sufficient time and information, in-language and relationally appropriate engagement, compensation for community members' time and expertise where appropriate, and clear pathways from input to outcome. The test of whether participation is meaningful is whether community members can see, and trust, that their participation made a difference.
(2: Public Participation)

Mutual Aid

The practice of communities organizing to meet one another's needs directly, through shared resources, time, and care, without relying on institutional intermediaries. Mutual aid networks are often already at work in low-income communities, providing food, childcare, transportation, housing support, and other essentials, and the community members who are looped into these networks often hold deep knowledge about what their communities actually need. The Toolkit notes that Grantees often overlook existing mutual aid networks when designing public services programs, missing opportunities to invest in and support work that is already meeting community needs in community-grounded ways.
(4.2: Public Services)

NIMBYism

Short for "Not In My Back Yard," NIMBYism refers to organized opposition by community members, often well-resourced and well-connected, to programs, facilities, or housing being located in their neighborhoods, even when such programs would benefit the broader community. NIMBYism frequently undermines programs designed to serve people who are unsheltered, low-income tenants, and other communities facing persistent service gaps. The Toolkit notes that current systems (including the mechanisms by which elected officials keep their jobs) tend to amplify the voices of well-resourced opponents over the needs of less-resourced community members. Anticipating and navigating NIMBYism is part of designing programs that actually reach the people CDBG is meant to serve.
(4.2: Housing)

No Wrong Door Approach

A service design principle in which community members are able to access the support they need from any entry point in an institution, without being turned away or sent on a frustrating chain of referrals. The principle recognizes that community needs do not arrive in neatly fragmented categories that match institutional silos, and that the burden of navigating those silos should fall on the institution rather than on the person seeking help. A No Wrong Door approach typically requires multiple entry points, warm hand-off protocols between staff and partners, and a culture in which staff are empowered to help no matter where or when someone first walks in.
(6.4: Key Principles for Community Responsive Design, Principle 4: Flexibility and Tailored Support).

Obstacle

Something that makes it harder for a community member to access, participate in, or benefit from a program, process, or service. Obstacles can be structural (eligibility rules, application complexity, documentation requirements), practical (transportation, childcare, scheduling, language), or relational (distrust built from past experiences, discomfort with institutional settings). Identifying and removing obstacles, rather than treating non-participation as a community problem to solve, is central to community responsive practice.

Participatory Budgeting

A democratic process in which community members directly decide how to spend a portion of a public budget, typically by proposing project ideas, refining them through community deliberation, and voting on which proposals to fund. The Toolkit names participatory budgeting as one Pillar of Designing With Communities, alongside collaboration and co-creation, and idea incubation. In a CDBG context, participatory budgeting can take the form of setting aside grant funds for a community board or community members to vote directly on specific projects, shifting decision-making authority closer to the people the funding is meant to serve.
(6.4: Key Principles for Community Responsive Design, Principle 1: Designing With Communities).

Persistent Service Gaps

The ongoing, structural absence of services, resources, opportunities, and investment in specific communities, often the same communities, over long periods of time. The Toolkit uses the term, "persistent service gaps" as its primary way of naming the conditions CDBG is meant to address: communities that have been under-resourced, overlooked, or actively disinvested from across generations and across multiple systems (housing, healthcare, education, transportation, economic opportunity). The phrase centers the structural pattern rather than placing responsibility on the communities experiencing the gaps, and it names the cumulative nature of the harm without flattening the specific histories that produced it in any given place.

Program Navigation

The processes, supports, and people that help community members understand, access, and move through programs and services. Program navigation includes things like intake processes, eligibility screening, application support, referrals between programs, and ongoing case management; it also includes the often-invisible work of community members and trusted partners who help people figure out where to start. Investing in program navigation, particularly through community-based partners and in-language support, can significantly improve who actually benefits from a program, especially among communities that have historically been underserved.

Public Comment

A formal mechanism through which community members can submit input (verbally or in writing) on a proposed government decision, plan, policy, or agenda item, typically within a defined comment period. Public comment is one of the most common forms of public participation, but it is also one of the most limited: comments are often invited late in a process, after key choices have already been made; the format can exclude people whose schedules, language, or comfort with government settings make participation hard; and public comment periods, by rule, have no room for back-and-forth between government officials and community members. Treating public comment as the primary form of engagement, rather than one tool among many, tends to reinforce the status quo.

Public Participation

The broader set of processes, structures, and practices through which community members take part in shaping the decisions, plans, and policies that affect their lives. Public participation includes formal mechanisms like public comment and hearings, but extends to advisory bodies, community workshops, listening sessions, surveys, partnerships with community-based organizations, and co-design processes. The quality of public participation is shaped less by how many opportunities are offered and more by whether those opportunities are accessible, meaningful, and connected to real influence over outcomes.

Reasonable Accommodation

Per the regulations, reasonable accommodations are changes, exceptions, or adjustments to a program, service, or procedure that allow a person with a disability to participate on equal footing. According to the regulations, there must be an identifiable relationship between the requested accommodation and the person's disability. Reasonable accommodations need not be provided if they would constitute an undue financial and/or administrative burden, or if they would be a fundamental alteration of the provider's program. Applying a community responsive lens to "reasonable accommodations" means looking at whether the accommodation is "reasonable" and/or the burden "undue" through the lens of the person with the disability, based on their expertise on their lives, their wisdom, and their priorities, rather than based on the government's assumptions. Listening and trusting is key to this shift.

Reciprocity / Reciprocal

A principle of mutual exchange between Grantees and communities, where the relationship runs in both directions rather than one. It means institutions not only request input or participation, but also give back—by showing up to community spaces, supporting existing efforts, compensating community expertise, and following community direction. Reciprocity is foundational to trust and sustained engagement. Reciprocal Relationships are partnerships between Grantees and community-based organizations or leaders grounded in mutual respect, trust, and service rather than transactional exchange. In these relationships, Grantees not only seek input when needed, but also support ongoing community work through non-transactional engagement, humility, fair compensation, and a willingness to take direction from community partners.
(2.3: Marketing)

Repair / Restorative Practices

Approaches to addressing harm that focus on understanding what happened, acknowledging the impact, and working with impacted community members to make things as right as possible, rather than relying solely on punitive consequences. In a CDBG context, repair and restorative practices are relevant when Grantees, subrecipients, or partner institutions have created harm in communities, whether through unintended consequences of programs, missteps in engagement, or longer histories of disinvestment. The Toolkit names restorative processes as a Pillar of Active Listening and Understanding, noting that Grantees may choose to use defederalized funds to establish a Community Reinvestment Fund as one tangible form of repair.
(6.4: Key Principles for Community Responsive Design, Principle 3: Active Listening and Understanding).

Resource Desert

A geographic area where community members face systemic shortages of essential goods, services, or supports, such as healthy food, healthcare, banking, broadband, public transit, or technical and consulting services. Resource deserts are not natural conditions; they are the cumulative result of disinvestment and policy patterns that have steered investment elsewhere. The Toolkit also uses the related term "consultant deserts" to describe rural areas where Grantees struggle to find partners willing to work locally.
(4.2: Economic Development, 4.3: Spotlight on Disaster Displacement).

Responsive Systems

Systems, including programs, services, agencies, and policies, that are designed and operated in ways that allow them to adjust based on what they learn from the communities they serve and the conditions they encounter. A responsive system has built-in mechanisms for gathering feedback, identifying when something is not working, and making changes; it treats responsiveness as an ongoing operating principle rather than a one-time design feature. Building responsive systems requires structural commitments to feedback, learning, and adaptation, not only individual goodwill.

Root Causes

The underlying ideas, conditions, structures, policies, and patterns that produce the outcomes we see, as distinct from the symptoms or surface-level manifestations of those outcomes. Addressing root causes means looking past immediate problems to ask why those problems exist in the first place, and being willing to change the conditions that produce them. For example, addressing the root causes of housing instability means examining housing policy, wage levels, healthcare access, and patterns of disinvestment, rather than focusing solely on emergency assistance for individuals already in crisis.

Right of First Return

A tenant protection in which the owner commits to initially offering an opportunity to a person, household, or community that was displaced by an associated action. For example, if federal funds are used to rehabilitate rental housing units, and existing occupants are relocated as a result of the rehabilitation, the displaced occupants are given the right to return to the rehabilitated units before the units are made available to new tenants.

Self-Determination / Community-Determination

The right of individuals and communities to make their own decisions about the issues that affect their lives, based on their own values, priorities, and wisdom. The Toolkit centers self-determination as a foundational principle: when low-income community members do not have a meaningful say in how CDBG resources are designed and allocated, they are stripped of their right to self- and community-determination, and the resulting programs are simply less effective. Honoring self-determination in CDBG practice means listening to and championing community priorities even when they differ from what Grantees or program designers might have chosen, and resisting the impulse to act as if the government knows better.
(2.2: Engagement, 4.3: Cross Programmatic Considerations)

Service Gaps

The differences between the services that communities need and the services that are actually available, effective, and easy to navigate. Service gaps can take many forms: services that do not exist, services that exist but are out of reach due to eligibility rules or location, services that are technically available but not designed in ways that work for the communities they are meant to serve, or services that are over-subscribed and effectively inaccessible. Identifying service gaps requires both quantitative analysis (such as disaggregated data on who is and is not being served) and qualitative input from communities about what is missing and why.

Technical Assistance (TA)

The support, coaching, training, and capacity building that HCD provides to Grantees, subrecipients, and partners to help them successfully implement CDBG programs and meet program requirements. Technical assistance can take many forms, including office hours, written guidance, templates, peer learning communities, and direct one-on-one coaching. The Toolkit emphasizes that technical assistance works best when it is responsive to what Grantees are actually facing on the ground, when it flows in both directions (HCD learning from Grantees as well as the reverse), and when it is paired with monitoring approaches that treat findings as opportunities for support rather than only correction.
(5.3: Monitoring and Evaluation, 6: Grounding in Community Responsiveness, 7: Project Stages).

Thriving Wage

A wage that allows workers to meet their basic needs and build economic stability over time within their actual local cost of living, rather than only meeting minimum wage requirements or matching the local market rate. The Toolkit uses "thriving wage" deliberately to push beyond "living wage," which can imply only basic survival. In a CDBG context, thriving wage frames a key measure of program success: not only how many jobs were created, but whether those jobs pay enough to actually shift the economic reality of the workers and communities CDBG is meant to serve.
(3.2: Procurement, 4.2: Economic Development).

Toxic Stress / Chronic Stress

The prolonged, severe stress response that occurs when a person experiences ongoing adversity without sufficient support, and that has measurable effects on physical and mental health, decision-making, and well-being. The Toolkit names toxic stress in connection with the displacement and relocation process, where notices of acquisition or relocation can trigger fear, uncertainty, and instability that compound over time. Recognizing toxic stress means designing relocation processes that minimize uncertainty, provide emotional and legal support, communicate transparently, and treat the people involved with patience and care, rather than treating relocation as a purely administrative procedure.
(4.3: Cross-Programmatic Considerations)

Transparency

The practice of making decisions, processes, criteria, and outcomes visible and understandable to the communities affected by them. Transparency includes sharing what is being decided, who is deciding, what information is being used, what trade-offs are being considered, and what the results have been in formats and languages that are accessible to community members, not only to professionals. Transparency is not the same as information dumping; it requires translating complexity into clarity and making information genuinely usable for the people it is meant to inform. (5: Accountability)

Trauma-Informed

A widely used framework for designing services that acknowledges the prevalence and impact of trauma in people's lives and works to avoid retraumatizing them through service delivery. The Toolkit uses "trauma-informed" as a point of contrast for its own preferred framing of "healing-informed practice." Where conventional trauma-informed approaches often focus on treating individuals and individual symptoms through a clinical model, a healing-informed approach treats healing as communal and views people as agents of their own and their community's well-being.
(6.2: A Healing-Informed Lens).

Trust Building

The active, ongoing practice of creating the conditions in which trust between institutions and communities can grow over time. Trust building includes consistent presence, follow-through on commitments, transparency about decisions and constraints, fair treatment, and showing up in ways that prioritize the relationship over the transaction. It is slow work that cannot be rushed or substituted with communications campaigns; it depends on what institutions actually do over time, especially in moments when easier choices might erode the relationship.

Undue Burden

A legal and regulatory standard used to determine whether a requested accommodation, modification, or action would impose significant difficulty or expense on the entity providing it. At the federal level, the standard appears in the Fair Housing Act and Section 504 of the Rehabilitation Act; in California, the Fair Employment and Housing Act (FEHA) provides parallel and in some areas broader protections. What counts as "undue" is not fixed; it depends on the size, resources, and structure of the entity, and on whose perspective is centered in the determination. Applying a community responsive lens to the undue burden standard means weighing the burden against the cost of not providing the accommodation and recognizing the expertise of the person requesting it in defining what is reasonable in their lives.

Warm Hand-Off

A relational referral practice in which a staff member or trusted partner personally connects a community member to another service, person, or organization, rather than handing them a phone number or website and letting them navigate the next step on their own. Warm hand-offs reduce the chance that someone falls through the cracks of fragmented systems, and they signal to the person being referred that they are being cared for through the transition rather than passed along. The Toolkit emphasizes warm hand-offs particularly for community members who may not qualify for a specific CDBG-funded program but who can be connected to trusted community partners who can help.
(4.3: Cross-Programmatic Considerations, 6.4: Key Principles for Community Responsive Design, Principle 4: Flexibility and Tailored Support).

Whole-Person, Whole-Family Approach

A service design principle holding that programs should respond to the full, interconnected reality of community members' lives, rather than treating people as fragmented sets of needs to be addressed by separate programs. Individuals and families experience housing, health, employment, childcare, transportation, and other dimensions of their lives as a whole, not as separate categories, and a whole-person, whole-family approach designs programs to reflect that reality. In practice, this often means providing wraparound support, building partnerships with other service providers, and giving staff the flexibility to respond to what someone actually needs rather than only to what the program is narrowly designed to address. (6.4: Key Principles for Community Responsive Design, Principle 4: Flexibility and Tailored Support).

Workforce Development

The set of policies, programs, and practices that prepare people for jobs, support their advancement in careers, and connect them to employment opportunities, particularly in fields tied to public investment such as construction, infrastructure, and community services. Community responsive workforce development goes beyond placement numbers to examine how job requirements, recruitment channels, training pathways, and advancement practices either open or close doors for people who face obstacles to employment with thriving wages. In a federally-funded context, this includes Section 3 hiring requirements (which prioritize employment opportunities for low-income residents in HUD-funded work) and apprenticeship and pre-apprenticeship pathways. In California, additional tools include prevailing wage requirements, skilled and trained workforce standards, and local targeted hire ordinances that direct opportunities to specific communities.

Wraparound Support / Services

A service approach that surrounds participants with the full set of supports they need to navigate a complex process, rather than addressing only one piece in isolation. In a CDBG context, wraparound support during a housing program, for example, might include emotional support, language assistance, legal aid, referrals to other services, and start-to-finish help with paperwork and decisions, in addition to the housing assistance itself. The Toolkit emphasizes wraparound support particularly in housing and relocation, recognizing that contracting and displacement are stressful and personal, and that providing only the regulatory minimum often leaves participants without the help they actually need to succeed. (4.2: Housing Programs, 4.3: Cross-Programmatic Considerations).

Colorful Hands 1 of 3
George Fox students Annabelle Wombacher, Jared Mar, Sierra Ratcliff and Benjamin Cahoon collaborated on the mural.
Photograph by Tim Mossholder

Appendix B

CDBG Toolkit: Strategies for Community Responsiveness