October 3, 2022

Attn: NSTC Subcommittee on Equitable Data, Office of Science and Technology Policy
Eisenhower Executive Office Building, 1650 Pennsylvania Ave. NW,
Washington, DC 20504

RE: Engagement and Accountability RFI 87 FR 54269

As the bipartisan, national membership association representing state and local health and human services agencies, the American Public Human Services Association (APHSA) welcomes the opportunity to share insights on how Federal agencies can better support collaboration with other levels of government, civil society, and the research community around the production and use of equitable data. APHSA’s members are experts in administering, overseeing, and aligning programs that build resilience and bolster well-being through access to food, health care, housing, employment, child care, community supports, and other key building blocks. Our members are also leading experts in data analysis, health and human services IT systems, workforce development and training, and the legal dimensions of the field.

In our response to the White House Office of Science and Technology Policy (OSTP) Request for Information, APHSA draws on insights from member engagement and APHSA-led initiatives to elevate the priorities of and promising practices discovered through state and local practitioners and policymakers. APHSA’s responses to RFI questions most directly draw from the following APHSA initiatives that exhibit successes and lessons learned on fostering equitable data collaborations.

Table 1: APHSA-led Initiatives

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<tr>
<th>Initiative</th>
<th>Description</th>
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<tr>
<td>Coordinating SNAP &amp; Nutrition Supports (CSNS)</td>
<td>Coordinating SNAP and Nutrition Supports (CSNS) is a cohort grant program administered by APHSA and funded by Share Our Strength’s No Kid Hungry Campaign. CSNS aims to align the Supplemental Nutrition Assistance Program (SNAP) with other federal, state, and local nutrition supports to combat childhood hunger. Through our CSNS grant program, six funded sites across Hawai‘i, Kansas, Mecklenburg, North Carolina, Michigan, New Jersey, and New Mexico are actively working to reduce cross-departmental silos, facilitate partnerships with community organizations, improve the experience of families accessing nutrition supports, and leverage data and technology to address systemic barriers and promote equitable access to nutrition benefits.</td>
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<tr>
<td>SNAP E&amp;T National Partnerships</td>
<td>APHSA, in partnership with the Association of Community College Trustees (ACCT) and the National Community Action Partnership (NCAP), is building a national approach to SNAP E&amp;T by providing technical assistance across two cohorts comprised of community colleges and CAAs to increase understanding, improve coordination with state and local agencies, and scale SNAP E&amp;T partnerships.</td>
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By forming strategic relationships across key national networks, states and local SNAP programs can learn how to best support their community partners and collaborate to develop career pathways leading to quality, sustainable employment for participants of SNAP.

Southeastern Cohort on Young Parents and Families

Third Sector is a national nonprofit that offers technical assistance to government agencies. They convened the Southeastern Cohort on Young Parents and Families which includes Georgia, Kentucky, and South Carolina to identify strategies that increase alignment and coordination between programs and public funding streams and develop new models for collaboration withing and between government agencies, nonprofit partners, and young parent families. APHSA partnered with Third Sector to write a report summarizing key lessons learned from the cohort.

1. What are examples of successful collaborations involving equitable data between the Federal government and (a) tribal, territorial, local, and State governments, or (b) local communities?

The three examples detailed here from the APHSA-led Coordinating SNAP & Nutrition Supports (CSNS) program (described in Table 1) illustrate the potential for equitable data collaborations between State and local governments and local communities to be scaled at the Federal level.

Example 1: Through their CSNS-funded project, the Michigan Department of Health and Human Services (DHHS) established a partnership with the Food Bank Council of Michigan and Poverty Solutions from the University of Michigan to leverage data insights to better understand and reduce food insecurity in the state. The research team at Poverty Solutions combined administrative and publicly available data to develop a public food insecurity map which will be used to establish state priorities for reducing hunger and addressing disparities in food access. The statewide food insecurity map, a major deliverable for the MI CSNS project, draws on data from the Michigan DHHS, Michigan Department of Education, the Food Bank Council of Michigan, the U.S. Census Bureau, and relevant non-governmental surveys and will be publicly available in 2023. This example exemplifies how data from various levels of government and community-based organizations can be used to identify and track progress on key public priorities.

Example 2: The Mecklenburg CSNS Project established a data sharing agreement between their County Department of Social Services (DSS), Economic Services Division (ESD); their Department of Public Health, WIC Office (DPH WIC); and the North Carolina Department of Health & Human Services. This data sharing agreement enables cross-agency access to historic and future SNAP and WIC case data, which is being used to identify gaps in benefit access. This CSNS team further collaborated with a local nonprofit, Loaves and Fishes, to hire a team of Food Security Navigators who have lived expertise with food insecurity to work at the community level to address access gaps born out in data analyses. As of Summer 2022 (the latest project data available), Mecklenburg County observed a 12% increase in SNAP enrollment, and a 13% increase among children. APHSA hopes to leverage the learnings from Mecklenburg CSNS project to scale this model by engaging SNAP administrators nationally.


Example 3: The Kansas CSNS Project created an automated data aggregation and outreach process to increase SNAP and WIC co-enrollment. In collaboration with local nonprofit, Delivering Change, Kansas hired a Family Benefit Navigator who has lived expertise with food insecurity to inform project design and implementation. Kansas executed a data sharing agreement across agencies to exchange SNAP and WIC participant data and develop a dashboard with daily updates available to the Kansas Department for Children and Families and the Kansas Department of Health and Environment. This has allowed their SNAP vendor, Accenture, to begin an integrated outreach campaign to enroll more eligible families.

2. Among examples of existing Federal collaborations with (a) Tribal, territorial, local, and State governments or (b) local communities involving equitable data, what lessons or best practices have been learned from such collaboration?

APHSA’s administration of the CSNS cohort has surfaced the following lessons surrounding the value of early data sharing agreements, stakeholder involvement, and peer collaboration to executing successful equitable data initiatives.

Lesson 1: Early coordination to establish data sharing/use agreements can enable data exchanges across levels of government and facilitated aligned modernization of service delivery.

A data sharing agreement between relevant programs, agencies, and/or governments should be drafted and executed as early as possible to accelerate implementation of initiatives that improve government service delivery to the public. Data sharing agreements can be leveraged to establish data coordination and analyses processes and create common understanding across agencies, thereby streamlining future data exchanges and reducing administrative burden, for example by minimizing duplicate data collection.

Lesson 2: Early stakeholder involvement and frequent communication is critical for sustaining momentum and overcoming silos.

Target populations should be included in data initiatives from the onset and meaningfully involved throughout analysis to avoid creating differential power dynamics. Partnering with community-based organizations can be an effective way to engage underserved communities and learn how policy impacts the American public. The Mecklenburg CSNS Project referenced above did this by hiring a team of Food Security Navigators in collaboration with a local community-based organization. The Food Security Navigators attended over 250 community events with more than 20,000 attendees to disseminate field surveys assessing residents’ knowledge and experience with nutrition assistance programs and barriers to accessing services. As people who have lived expertise with food insecurity, the Food Security Navigators play a critical role in connecting and building trust with the community. Furthermore, Mecklenburg established an executive steering committee comprised of community-based organizations that collaborate to design new strategies to engage with families who are eligible for but not enrolled in nutrition supports.

Additional key stakeholder groups to involve in early discussion include Technology leads and IT departments, Legal teams, and Project Management leads. IT departments can evaluate the feasibility of project proposals, technical implications of data management, and security concerns while legal experts can explore the legal and policy justifications needed to execute data sharing agreements. Project management and sponsorship can heavily influence the success of a data collaboration. Designating a project sponsor to champion the effort helps maintain momentum and remove roadblocks to success.

Lesson 3: Close collaboration among peers and across levels of government, leadership, and relevant stakeholders breaks down silos and promotes project sustainability.

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Collaborative efforts across levels of government, leadership, and relevant stakeholders can break down silos and reduce the risk of roadblocks during periods of tense political climate. Peer learning promotes scale of evidence-based solutions and improves efficiency. In the CSNS projects, this was accomplished by implementing a cohort model where States and local governments regularly convened to share updates, anticipate problems, troubleshoot, and co-create innovative practices.

3. **What resources, programs, training, or other tools can facilitate increased data sharing between different levels of government (Tribal, territorial, local, State, or Federal) related to equitable data?**

Because data is collected and stored differently across systems and levels of government, data collaborations can prove challenging. The tools and resources named below have been leveraged by CSNS project sites to overcome these challenges.

**Resource 1: Legal and Policy Data Sharing Guidance**

CSNS projects engaged legal experts to identify policy and legal justifications for sharing data. Federal guidance pointing to existing data sharing authorities leveraged across levels of government, precedent and proven practices established by effective state, local, and federal data collaborations, and legal justifications for various uses of shared data could set the foundation for new collaborations and align legal interpretations to promote equitable uptake of modern practices nationwide.

**Resource 2: Template Data Sharing/Use Agreements**

Template data sharing agreements have proven to be powerful tools for quickly and systematically enabling the use of legal justifications to exchange data across governments and programs. Data sharing templates can reduce administrative burden on government agencies seeking to modernize systems and data processes. Technical assistance to adapt and deploy template agreements for targeted uses can further enable prompt execution of implementation-focused agreements.

**Resource 3: Tailored Data Tools**

Tools tailored to project needs – such as data dashboards, and other dynamic data visualization and analysis instruments – help agencies effectively organize, share, and understand data. The Kansas CSNS Project created a data lake under a data sharing agreement that houses data from SNAP and WIC programs so that program administrators can view the data collectively, pull reports, and establish and evaluate targeted data-driven program initiatives. In addition, the Michigan CSNS project team built feedback loops within their eligibility system to track referrals, client participation, and utilization of private food banks and SNAP. State and community partners will soon be able to use this data to identify service gaps and opportunities for public and private anti-hunger organizations to streamline access across nutrition supports.

**Resource 4: Dedicated Staffing**

Several CSNS sites found that project management roles in particular were critical for moving collaborative data projects forward, sustaining momentum, and connecting project activities. Hiring staff specifically dedicated to project management for data collaboration is necessary to build sufficient capacity to carry out these new projects and bring in advanced analytics expertise to draw deeper insights from the data.

**Resource 5: Collaboration Frameworks**

APHSA, in collaboration with state agencies and third-party providers, created the SNAP E&T Third-Party Partnerships: A Framework to Collaboration and Communication for Improved
Participant Outcomes.\textsuperscript{5} Driven by feedback and responses gleaned from state agency staff administering SNAP E&T and third-party direct-service providers, the framework is a reflection of stakeholder voices that examines the mechanics of strong partnerships between agencies and providers, fostered by communication, trust, and collaboration.

4. **What resources, programs, training, or tools can increase opportunities for community-based organizations to use equitable data to hold government accountable to the American public?**

Throughout the full CSNS cohort initiative, community-based organizations across sites developed and strengthened partnerships with state agencies to use equitable data for increased accountability and transparency to the general public in various ways.

The Michigan and Mecklenburg County CSNS projects in particular have effectively leveraged the tools and resources referenced in our response to question 3. Administering the CSNS cohort has demonstrated the potential for public facing instruments – such as the Mecklenburg survey analyses, and MI Food Security Map mentioned in response 6 below – to convey the impact of community engagement and deepen evaluation practices.

5. **What resources, programs, training, or tools can make equitable data more accessible and usable for members of the public?**

Public facing maps, dashboards, and narratives are tools governments can use to share data with the public. Outlined below are examples of how CSNS projects employed these tools to make complex data more accessible.

**Example 1:** The Mecklenburg CSNS Project Food Navigators collaborated with the County Public Information team to craft stories from their outreach work that will be shared on government websites, press releases, and news posts. Public facing narrative work can weave together qualitative and quantitative data in an accessible format that is grounded in context. If these stories are co-created with the communities they highlight, they offer an important opportunity to build trust and resonate with the American public by uplifting and affirming lived expertise.

**Example 2:** The Michigan CSNS Project created a food insecurity map that will be an essential aid to the Michigan Department of Health and Human Services as they continue to prioritize equity and tailor outreach to historically underserved communities. The public map will help community-based organizations identify the most adversely affected populations for targeted programs and services.

6. **In which agencies, programs, regions, or communities are there unmet needs, broken processes, or problems related to participation and accountability that could be remedied through stronger collaborations and transparency around equitable data?**

While many programs, agencies, regions, and communities can benefit from stronger collaborations and transparency around equitable data, APHSA highlights in this response the potential in SNAP to close participation gaps and mitigate benefits cliffs.

**Priority: Closing benefits participation gaps**

Many eligible families are not enrolled in SNAP. Some CSNS projects are addressing this problem by matching SNAP data with data from other programs for low-income families such as WIC to identify enrollment gaps and conduct targeted outreach. This work has reduced administrative burden associated with enrolling clients in separate programs and collecting duplicate data. These collaborations could be further strengthened through partnership with the Federal government by establishing a data sharing

\[\text{\textsuperscript{5} SNAP E&T Third-Party Partnerships: A Framework to Collaboration and Communication for Improved Participant Outcomes -}\]

https://files.constantcontact.com/391325ca001/33e1d0f9-f779-49f9-a813-f96fa0da6642.pdf
agreement where States and local governments can access Federal SNAP data to identify gaps and inequities.

Young families sometimes fall into benefit gaps as they utilize services administered by different offices. The Southeastern Cohort on Young Parents and Families⁶ was an effort to provide technical assistance to a cohort of three states to improve services targeted to young parents and families. In Georgia, they found that young parents who were transitioning out of foster care were often unaware they needed to reapply for Medicaid leading to loss of health care coverage. To address this broken process, the Georgia Division of Family and Children Services implemented policies and procedures to increase coordination between Child Welfare and the Office of Family Independence through data sharing agreements and partnership with Medicaid, SNAP, TANF, and other offices that young parents are likely to engage with as they transition out of foster care. The Federal government could use this model and the practices and tools outlined in this letter to help other states implement similar strategies.

Priority: Mitigating benefits cliffs

SNAP E&T provides an opportunity for families with low-income to help stabilize their family, while moving forward on a path to economic mobility. One problem related to SNAP E&T participation is the benefit cliff. There is an opportunity here to address the issue of workers of color being disproportionately concentrated in lower-wage jobs and therefore more likely to rely on benefits. When participants are moved into a job with a slight pay increase, their benefits are often cut or taken away entirely, without regard to family stability. Each incremental pay increase places them in a precarious position where they may lose benefits, but still be unable to able to afford family expenses. This, plus inflation, means that it is nearly impossible for families of color to escape poverty and move up the economic ladder.

Data can be used to fully flesh out the impact of wage increases versus cliff effect. This would empower a participant by providing information that can help them make an informed decision about career pathways. Stronger collaborations and transparency around equitable data also empowers state agencies to develop informed policy solutions.

Conclusion

APHSA appreciates the opportunity to offer insights on how Federal agencies can better support collaboration with other levels of government, civil society, and the research community around the production and use of equitable data. Drawing on successful examples from our member engagement and recent initiatives, we have highlighted a series of best practices, tools, resources, and recommendations that enable effective data collaboration to solve public problems. Data sharing agreements, early stakeholder involvement, and community engagement are key strategies to execute equitable data initiatives. Working across levels, agencies, and organizations breaks down silos and builds a strong foundation for sustained partnership, and APHSA is eager to see greater collaboration in the future.

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