



DRAFT COMMUNITY ENGAGEMENT PLAN GUIDANCE

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ABSTRACT

The Community Engagement Subcommittee recommends that each agency develop a Community Engagement Plan to fit agency-specific work. We have outlined elements of a plan in this document to support meaningful engagement. Our approach guides an agency to develop its own best practices, informed by successful examples, and comprising elements designed to overcome barriers to engagement that are typical of agency work.

Community
Engagement
Subcommittee

Washington Environmental Justice
Task Force

Contents

1. Introduction	2
1.01 Why Community Engagement is Crucial	2
1.02 Community Engagement and Environmental Justice	3
1.03 Acknowledging Current and Historical Harms	3
1.04 Statement of Scope	4
1.05 Authority	4
1.06 Who Washington State Agencies Serve	4
1.07 Equitable Approaches to Community Engagement	5
1.08 Planning and Approaches – Plan Stages in Detail	6
2. Elements of Your Agency-Specific Community Engagement Plan	8
2.01 Determining Obligation	8
2.02 Funding	9
2.03 Engagement and Consultation with Tribal and Indigenous Peoples	9
2.04 Identifying a Responsible Coordinator	11
2.05 Addressing Representation and Access	11
2.06 Addressing Information	11
2.07 Addressing Ethical Data Collection	12
2.08 Language Access	13
2.09 Choosing Services and Service Providers	13
2.10 Training	15
2.11 Policy and Legislative Development	15
2.12 Agency Accountability and Responsibility	16
Appendix A, Public Participation Evaluation Tool	0
Appendix B, Public Participation Spectrum	0
Appendix C, Barriers to Meaningful Engagement	0

1. Introduction

1.01 Why Community Engagement is Crucial

The governing structures of the United States were designed to elevate the rights and access to its resources of some people at the expense of the rights and access of others. These weighted structures led to the systemic inequity that the environmental justice movement responds to. They have been reaffirmed across history, often in response to efforts to move toward more equitable laws and practices, and are widely maintained today.

The guidance that follows is grounded in the position that these systems cannot change without the direct involvement of the communities who have borne the weight of systemic disparities, and that Washington State's government does not often currently support such involvement. This document guides agencies to reduce barriers to public engagement, seek and integrate feedback from those impacted by agency decisions to build systems of decision-making that benefit from influence of communities whose lived experience includes more cancer, more respiratory disease, and fewer years of life in correlation with environmental hazards.

Meaningful community engagement increases community understanding of agency decisions, transparency, and trust in government actions, and builds more sustainable programs and decisions. State agencies have a responsibility to create community engagement opportunities that allow all of Washington's diverse communities "equal access to the decision-making process to have a healthy environment in which people live, learn, and work."¹ Without it, as history demonstrates,² entire populations are *repeatedly* left out, adding to existing social and health burdens. Furthermore, many agencies are directed by policy and federal, state, and local laws to implement meaningful community engagement and participation.

The Community Engagement Subcommittee recommends that **each agency develop a Community Engagement Plan to fit agency-specific work**. We have outlined elements of a plan in this document to support meaningful engagement. Our approach guides an agency to develop its own best practices, informed by successful examples, and comprising elements designed to overcome [barriers to engagement that](#) are typical of agency work.

Here, we describe pathways to a type of community engagement that empowers members of the public to collaborate with state agencies in making decisions that will have direct impacts on them. However, we recognize that engaging the public as partners in 100% of agency decision-making is not ideal for even the most motivated community. As a foundation of this guidance, we recommend an [evaluation process](#) to determine when that level of engagement, on one end of a spectrum, is valuable and when engagement that requires fewer resources is appropriate.

¹ <https://www.epa.gov/environmentaljustice>

² <https://archive.epa.gov/ncer/ej/web/pdf/brender.pdf>

1.02 Community Engagement and Environmental Justice

All agencies can embed environmental justice into their missions by prioritizing and investing in meaningful community engagement, especially in [areas of critical concern across Washington](#).³ One of the defining documents of the environmental justice movement is the *17 Principles of Environmental Justice*, which were drafted and adopted by the delegates to the First National People of Color Environmental Leadership Summit in 1991. Principle #7 explicitly states the need for community engagement to achieve environmental justice.

Environmental Justice Principle #7: “Environmental Justice demands the right to participate as equal partners at every level of decision-making, including needs assessment, planning, implementation, enforcement and evaluation.”⁴

The foundation of meaningful community engagement must be an evaluation of who is negatively impacted and who is benefitted by any agency decisions meant to benefit the public as a whole. This foundation stands in contrast to the common practice of starting with requirements outlined in law or policy. This guidance outlines and helps agencies identify common agency activities that do not typically involve, but can significantly impact, the public.

1.03 Acknowledging Current and Historical Harms

Building room in government decision-making for the voices of underserved and overburdened communities is one necessary component of correcting current and historical harms that communities of color, low-income communities, and other affected populations in Washington have endured. The Government Alliance on Race and Equity (GARE) names the responsibility that government has in reversing these injustices to eliminate environmental health disparities and build community trust in government systems and institutions.

“From the inception of our country, government at the local, regional, state, and federal level has played a role in creating and maintaining racial inequity. A wide range of laws and policies were passed, including everything from who could vote, who could be a citizen, who could own property, who was property, where one could live, whose land was whose and more. With the Civil Rights movement, laws and policies were passed that helped to create positive changes, including making acts of discrimination illegal. However, despite progress in addressing explicit discrimination, racial inequities continue to be deep, pervasive, and persistent across the country...Institutions and structures have continued to create and perpetuate inequities, despite the lack of explicit intention. Without intentional intervention, institutions and structures will continue to perpetuate racial inequities.”⁵

³ As an initial step, agencies can consider prioritizing investing in community engagement in Census tracts ranked nine and ten on the Environmental Health Disparities Map.

⁴ <https://www.nrdc.org/sites/default/files/ej-principles.pdf>

⁵ [GARE Racial Equity Toolkit](#)

1.04 Scoping Considerations

The Community Engagement Subcommittee built this guidance without the benefit of the tools and resources recommended in it. While we made every effort toward inclusion and representation, our work is inherently limited to the perspectives of those who were able to participate most. Namely, the voices represented in this document are largely from those whose time was supported financially by their jobs and whose workload allowed time to participate. In this document, there are many instances when the Community Engagement Subcommittee speaks for people whose needs and experiences we do not fully understand, and we recognize that as a limitation to this work. Our work illustrates the critical value of designing the community engagement process into a project's timeline and budget.

1.05 Authority

Washington State agencies are bound by several federal and state regulations that influence or rely on community engagement. Central here are:

- Title VI of the Civil Rights Act, which prohibits discrimination based on race, color, and national origin.
- Executive Order 13175, which recognizes tribal sovereignty and requires consultation and coordination with Indian Tribal Governments.
- Title II of the Americans with Disabilities Act, which requires agencies to conduct business in a way that provides access to people with disabilities.
- Section 508 of the Rehabilitation Act, which prohibits discrimination on the basis of disability by agencies receiving federal funding.
- Executive Order 13166, requiring recipients of federal funding to accommodate people with limited English proficiency in their services and programs.

These regulations have broadly influenced state- and agency-specific policies as well. Phrases such as “meaningful engagement” proliferate. We imagine that state-level compliance with these laws and policies would amount to an equitable governmental landscape, free of the objectively disproportionate impacts of state decision-making that have led to the Environmental Justice Task Force. Agencies that may have grown accustomed to nominal compliance with laws such as these are encouraged to re-evaluate their practices through the lens presented in this document.

Relevant Tools & Resources

- [Title VI of the Civil Rights Act](#)
- [Executive Order 13166](#)
- Results Washington's outcome measures:
 - [Efficient, Effective, and Accountable Government](#)
 - [Healthy and Safe Communities](#)

1.06 Who Washington State Agencies Serve

The central function of a public agency is to serve the public. We know that demographic data is inherently limited as it does not represent major swaths of the population, such as people who are

undocumented, Indigenous peoples, and the LGBTQ community. We also know that agency leadership and staff are often not representative of the population they serve, which means decision-makers often do not have the same life experiences as the people affected by their decisions. Community engagement is, therefore, a crucial process that allows agencies to better serve the public through a greater understanding of the diversity of lived experiences and perspectives across Washington's communities.

We recommend that agency staff prepare to create a community engagement plan by asking: *Who might be affected by the agency work?* We recommend agencies name who and which communities might benefit from or be negatively impacted by agency processes, projects, or programs.

We recommend agencies create a "Who We Serve" section within the introduction of the agency community engagement plan to clearly name the communities that may be impacted in some way by internal or external agency work. In developing that section, demographic data will be a useful starting place, but direct communication with people in the impacted populations themselves will remain key to a meaningful understanding of the audience.

Agencies can ask themselves the following questions as part of developing the "Who We Serve" section of their plan:

- Who or which communities benefit or are impacted by the outcomes of an agency process, project, or program?
- Who or which communities might be impacted in some way at stages throughout an agency process?
- Are there communities or groups of people that are especially vulnerable to impacts, disproportionately affected, and underserved in some way by the process, project, or program?
- Which communities might engage and which might not in an agency process, project, or program? And why?
- Which environmental justice-related existing assets, resources, and knowledge exist within communities?

Relevant Tools & Resources

- Community Engagement Self-Assessments:
 - [Office of Financial Management Diversity, Equity, Inclusion Council Resources](#)
 - [City of Seattle Inclusive Outreach and Public Engagement Guide](#)
- [The DOH Community Engagement Guide](#)
- To Identify Stakeholders: [Community Engagement: Guidelines for Excellence \(pp. 126-128\)](#)

1.07 Equitable Approaches to Community Engagement

Community engagement covers a range of approaches, from outreach and consultations, to long-term collaborations, shared leadership, and supporting resident-led efforts. However, meaningful community engagement goes beyond a set of activities – it is a way of fostering trust, strengthening relationships, and honoring community knowledge. This leads to more effective and equitable solutions.

While the specific methods of engagement will differ depending on the context and the community, State agencies can find ways to center the voices of the highly impacted communities in planning and decision making.

As you work to advance environmental justice and equity across the state, embrace community engagement as an agency-wide plan that goes beyond the short-term needs of projects or programs. This plan should recognize communities' expertise and power to help shape solutions, as well as create planning and decision-making structures that are inclusive, accessible, flexible, and culturally appropriate.

To foster trust building, center community voices, and create equitable outcomes, use an equity lens to identify your community engagement approaches:

- Examine the power dynamics and structures within your agency that maintain inequities. These dynamics determine who you choose to engage and how, who is included and not included in decision-making, and how community members' power is valued and accounted for in your agency's work. Taking this first important step to understand and address these dynamics is critical to meaningful community engagement.
- Ensure communications and engagement efforts are carried out in a way that honors community strengths and do not reinforce narratives that can re-traumatize historically marginalized populations. Partner with community liaisons, hire staff that represent the communities you serve, and train staff on cultural competency skills.
- Align engagement efforts with clear opportunities for community to influence agency decisions – in a process that prioritize the knowledge, concerns, and ideas of the most impacted communities. Ensure these opportunities are supported by the community's capacity to engage meaningfully. If needed, invest in building their capacity.

Relevant Tools & Resources

- [Racial Equity Tools – Power Analysis](#)
- [Policy Link's Community Engagement Guide for Sustainable Communities](#)

1.08 Planning and Approaches – Plan Stages in Detail

Equitable community engagement begins before the project starts. Staff need time to plan for determining how community engagement fits into efforts as a whole using the considerations below. These considerations allow time for staff to identify and engage the appropriate stakeholders and community members in meaningful ways. Engagement planning steps, timing, and considerations are often concurrent, and multiple engagement activities may be required within a project. To ensure communities are engaged in a way that produces optimal outcomes for all parties involved, we recommend that State agencies require that all project plans include community engagement and outreach scope, goals, and estimated funding needs.

Key timeline and planning considerations for developing a community engagement plan:

1. **Project scope:** Within the project scope, a community engagement plan should identify what regulatory, systemic, and environmental impacts and outcomes the program, project or policy will have—intended and unintended—on underserved, under-supported, historically marginalized, and overlooked communities or populations.

2. **Community impacts:** Identify how communities and populations may be disproportionately impacted and what guidance is needed and what input could be gathered?
3. **Types of community engagement:** Use a comprehensive approach to implement the types of engagement that are meaningful to the specific audience(s).
4. **Equitable engagement:** Outline an approach to determine who should be engaged and how. Use the [Environmental Health Disparities Map](#) and/or [EPA's EJSCREEN](#) tool to identify additional areas of need. Include considerations for community groups and jurisdictions that are already active on this topic.
5. **Build relationships:** Key contacts or community champions provide critical access to hard-to-reach populations. Plan to take the time to solicit local and regional viewpoints, regardless of knowledge or existing connection in the community.
6. **Budget for engagement activity:** Consider partnering with other agencies or entities to maximize time and funding. This may take time, so provide for this in the timeline.
7. **Media and promotion:** Plan time to research what media platforms are most used and most available to best reach your audiences. Consider a variety.
8. **Include timeline for application or request for funding (RFA/RFQ):** There are established timelines within procurement guidelines as outlined in [RCW 39.26](#). You can make access to funds more equitable with flexibility for expanded timelines or by providing technical assistance to support communities with less capacity to be competitive.
9. **Evaluate existing programs and projects:** Evaluate existing engagement to assess where community engagement is inadequate or is missing altogether and begin to plan and incorporate it into ongoing efforts. For example, programs like the [Department of Ecology's Model Toxics Control Act](#) are currently going through rule revision and evaluating places where public engagement should be incorporated since it is an opportune time to incorporate community engagement into regular requirements of program action.

Relevant Tools & Resources

- [Strategic Prevention Framework](#)

2. Elements of Your Agency-Specific Community Engagement Plan

2.01 Determining Obligation

In the early stages of developing or revising any agency service or program, we recommend that each agency evaluates the program's impact on the public and determine community engagement accordingly. This accommodates both the reality that it is not appropriate for all agency work to be moderated by a public voice, and the fact that the voice of those significantly impacted by agency decisions is a critical component of equitable, effective, and sustainable programs.

This process is applicable to all agency activities. The steps outlined above are as relevant to an agency's grant-making program as their proposal to make changes to a neighborhood infrastructure. They guide agencies to a more rigorous level of community engagement when the impact of their decision is greater and a more streamlined approach for low-impact decisions.

These evaluations can be conducted with a structured tool (see examples provided in Appendix A and B), and can be simple screenings or complex processes, depending on the complexity of the program being evaluated.

The core elements of determining obligation include a series of steps to understand the relevance of the program to the public:

- Understanding the intentional and unintentional burdens and benefits of the program
- Identifying who and how many people are burdened/benefit (see Demographics below)
- Identifying social relevance of the program
- Outlining the potential for the program to impact someone's legal, financial, physical, or social health
- Confirming legal notification and outreach requirements.

These steps are followed using a systematic tool such as the International Association for Public Participation P2 Spectrum to align the level of public relevance with the suitable level of community engagement.

Demographics

Using demographic data is a key element of the screening process when determining who lives in an area that could be affected by agency decisions. We support the Environmental Justice Task Force's recommendation of conducting area assessments with Washington's Environmental Health Disparities Map as an initial screening process to find information about population, race, language, and income. This screening can inform follow up outreach with local organizations, schools, public health agents, and community leaders to learn information that demographic data cannot provide, such as preferred communication pathways, presence of languages of lesser diffusion, or the presence of underrepresented communities not defined in census data.

Relevant Tools & Resources

- Community Engagement Evaluation Tool (Appendix A)
- International Association for Public Participation P2 Spectrum (Appendix B)
- [Racial Equity Toolkit](#), Government Alliance on Race and Equity

- If agencies receive EPA funding, consider the following resources that describe environmental justice and community engagement expectations associated with that funding (note that other federal funding agencies may have similar guidance):
 - [Environmental Justice Interagency Working Group Framework for Collaboration](#)
 - [EPA's procedural safeguards checklist for funding recipients](#)

2.02 Funding

Providing adequate funds and resources for community engagement is the backbone to implementing best practices for meaningfully reaching diverse communities across Washington. Well-resourced community engagement lowers the risk of an agency being out of compliance with federal and state requirements and leads to greater agency efficiency. Investing in community engagement is necessary to provide effective customer service for Washington's residents. Therefore, think critically about how to prioritize funds and resources for community engagement, which includes incorporating a funding element to an agency-specific community engagement plan.

Key elements of your agency's community engagement plan identify available funds and resources to systemically and intentionally:

- Hire or contract expert⁶ community engagement coordinators, possibility through community organizations, to provide agency leadership on engagement planning and staff training.
- Communicate with communities in a culturally and linguistically relevant way, including following your agency's federally-mandated language access plan, translating documents, and providing interpretation for all interactions and verbal presentations.
- Compensate community members and organizations for their time and expertise and streamline the reimbursement process for community engagement-related expenses.
- Provide funding for multiple community engagement formats (e.g. public meetings, focus groups, surveys, community festivals, community beautification projects or artwork, etc.).
- Make transportation, culturally appropriate food, and childcare available for all events that include members of the public.
- Support staff travel to different parts of the state to engage with diverse communities.

Relevant Tools & Resources

- The [Valuing Engagement Toolkit](#) can help agencies identify and articulate the costs and benefits of engagement, and assist with making the business case for community engagement.
- The [Independent Sector](#) values volunteer time at \$25.43 per hour, on average, across the U.S.
- Government example: The National Park Service & U.S. Forest Service valued its volunteers' time at [\\$179 million](#) in 2018.

2.03 Engagement and Consultation with Tribal and Indigenous Peoples

Tribal and Indigenous peoples have existed and prospered in what is now Washington state since time immemorial. Tribal and Indigenous peoples in Washington state are not homogenous – there are 29 federally-recognized Tribes, many non-recognized Tribes, tribal and Indigenous peoples that come from other parts of what is now the U.S., Alaskan Natives, Native Hawaiians, and Indigenous peoples from all

⁶ See section 2.09 for a discussion of expertise.

across the world. Therefore, using a tailored approach to engage with tribal and Indigenous communities is not only necessary, but also acknowledges the diversity of tribal and Indigenous peoples in Washington. Tribal and Indigenous engagement is a part of any project or policy that might affect these communities (which is almost all the time) and applies to governmental and non-governmental entities. Tribal and Indigenous engagement is *not* a substitute for tribal consultation, which is a specific process of early, often, and meaningful communication and coordination between tribal governments and State or federal governments.

Key considerations when engaging with tribal and Indigenous peoples:

- **European colonization has disrupted virtually all aspects of tribal and Indigenous cultures.** This has led to a variety of disparate and disproportionate environmental, social, and economic outcomes for Indigenous peoples in Washington state.
- **Acknowledge and cede space to local tribal and Indigenous leaders and sovereignty.** Tribal sovereignty should always be centered, and space should be ceded to the tribal leaders and elders. Each Tribe and Indigenous community have their own leaders, cultural norms, and values. Consistency between an agency's engagement intentions and agency policies are an integral part of honoring and respecting sovereignty.
- **Building trust and relationships is integral to have positive outcomes.** Many tribal and Indigenous communities and peoples are protective of who is allowed to hold influence and community platforms – even with external engagement events. It is necessary to build trust and relationships with these communities, which means showing up and listening without pre-intended outcomes of what you want from them. This might mean giving something without expectation of reciprocity. One-off engagement events often do not build the trust and relationships needed for successful outcomes and is likely to lead to more long-lasting harm.
- **Pay for time and space.** If you want to do real engagement, you need to support the local community. That could mean renting local venues, hiring Native caterers and families, and compensating people for their time. In many communities, it is customary to bring gifts for key individuals to express gratitude for their presence and contributions.
- **Respect local norms and protocols.** There are often many formal and informal cultural and local norms and protocols. Oftentimes, relationships must be built before these norms and protocols become evident. Some general norms include, but are not limited to, respecting when elders and leaders speak, scheduling meetings around fishing and hunting seasons, and scheduling meetings around key community events (e.g., high school football games, tribal holidays, etc.).
- **Engagement outcomes are dependent on the investments into engagement with tribal and Indigenous communities.** People within and between tribal communities are part of a wide and communal network. Conducting poor engagement within a community is likely to result in poor communication and dissemination of information within the social networks of a community. Additionally, conducting poor or no engagement is likely to create a bad reputation across the tribal and Indigenous networks in the state, which may lead to additional barriers in the future when trying to engage those communities.
- **Tribal and Indigenous engagement does NOT substitute for tribal consultation.** Each Tribe is likely to have their own consultation procedures, which supersede agency policies. Consultation needs to happen early, often, and meaningfully.

2.04 Identifying a Responsible Coordinator

Include identifying the role of an agency-wide contact person or coordinator in your agency-specific community engagement plan. To be effective, this coordinator will be able to strategize the agency's diverse engagement needs, introduce and disseminate best practices across the agency, and ensure that the standards identified by the agency are being met.

More specifically, responsible coordinators are especially important during environmental justice emergencies. To be most effective, coordinators will be on the frontlines with highly impacted communities and sensitive populations to plan for and respond to emergencies such as hazardous substance releases and oil spills in order to assess the impact, monitor the situation, provide technical assistance, and evaluate the effectiveness of the response efforts.

Relevant Tools & Resources

- [EPA's On-Scene Coordinators](#)

2.05 Addressing Representation and Access

One of the most critical components of conducting meaningful community engagement is valuing the representation from community members who are most impacted by agency decisions. This takes hard work, and often means "swimming upstream" to question agency norms or the status quo of how an agency conducts community engagement.

At the core of representation and access is:

- A deep understanding of an agency's audience, which cannot be achieved without valuing cultural humility, and building relationships and community trust.
- Culturally and linguistically appropriate communication, such as plain talk, translation and interpretation, informational animations and graphics, and various formats and opportunities for communities to engage with an agency.
- Acknowledging and addressing internal biases and hiring and other staffing practices that may unintentionally "screen out" individuals from highly impacted communities.

2.06 Addressing Information

Much of the information agencies need to engage community members about is highly technical and contextual. Agency-specific community engagement plans address the [common barriers](#) each agency encounters when they deliver highly technical, discipline-specific information to the public and how to share information and ask questions in ways that facilitate understanding among the public, especially individuals with little or no technical background.

Key issues on this topic to include in an agency-specific community engagement plan:

- Plain talk, including defining what it means for the agency and when and how to use it. This will include writing for people with varying levels of literacy, writing for translation, and speaking for interpretation.
- The use of visuals to support written copy.

- The value of education when an agency is going to engage communities with little technical or policy understanding, including educational tools. This will include ideas for partnering with community based organizations who already educate community members on similar topics.
- Culturally appropriate communication, including how and when to assess for [cultural appropriateness](#) and what to do when you misstep.
- Opportunities to partner with agency communications departments.

2.07 Addressing Ethical Data Collection

Given our increasingly diverse population, it is crucial that agencies think critically about the way data are gathered and why certain populations routinely are not counted or accurately represented. To get a more holistic understanding of the communities an agency serves, the agency must collect both quantitative and qualitative data. An agency's community engagement plan guides how the agency intends to address data gaps and prioritize ethical data collection policies and practices. We recommend that agencies especially prioritize data collection to evaluate the effectiveness of community engagement work to determine whether or not the community is actually being served by the agency's efforts.

Quantitative Data

A common way to gather quantitative data is through surveys, like the Census. Disaggregating demographic data allows State agencies to begin to identify how various segments of the population may be impacted by different policies, programs, or projects. We must also acknowledge that the way we currently collect demographic information has limitations and cannot capture the full identity of an individual.

When collecting quantitative data, ask:

- What will these data be used for?
- Who is left out? How are they left out?
- How can we frame our approaches and questions in a culturally relevant manner?
- When surveying people who speak languages other than English, does the survey reflect the logic and nuance of each language?
- How will we protect the privacy and security of community members? And how will we convey this protection to community members? How will we honestly communicate risks?
- How will we share data with the broader community (e.g. the process to provide feedback on data interpretations, how data are represented in a recommendation or final report, etc.)?

Qualitative Data

Community engagement is one important way to gather qualitative data. Agencies need to understand the nuances of a community's lived experiences to make informed decisions. Building relationships and conversing with community members and trusted community leaders provides insight beyond demographic data. When engaging communities, it is important to recognize and value the community as a partner in the process, including sharing findings with communities for their feedback before finalizing a decision that may affect their lives.

Questions to consider when collecting qualitative data include:

- How do we get informed consent? What does this mean for online spaces?

- How do we maintain anonymity if that is requested/desired? How does this happen when State agencies given the required protocols for certain public meetings?
- How do we collect and share data from marginalized or sensitive populations without further creating trauma or jeopardizing their safety?

2.08 Language Access

All State agencies that receive federal funding are bound by a 2004 executive order and pursuant guidance from federal agencies to ensure their services and programs are equally accessible to people with limited English proficiency. Extensive guidance has been developed to support those legal requirements, see Relevant Tools and Resources below for details.

In addition to agency-wide systems that help staff decide when and how provide multi-lingual communication, cultural appropriateness of the communication and delivery method are critical considerations.

Translation and interpretation needs are often determined using a threshold described in federal language access plan [guidance](#): if 5% or 1,000 individuals in a population prefer a specific non-English language, translation or interpretation is likely appropriate. However, when agency decisions can have meaningful, direct impacts on the public, it is important to pay attention to smaller linguistic groups even if a language does not meet that threshold. Special attention must be paid to providing accurate services in languages that are often overlooked. For example, indigenous Mexican languages, languages that have no or short histories of being written, and dramatically distinct “dialects.”

Lastly, American Sign Language, while a key element of each agency’s ADA accommodations, is a language and belongs in language access planning.

Relevant Tools and Resources

- National standards for [culturally and linguistically appropriate services](#)
- [Federal guidance](#) for developing language access plans and providing language services
- Detailed guidance from the Environmental Protection Agency on developing and fulfilling language access plans

2.09 Online engagement and internet access

When Washington State joined the rest of the country in responding to the novel coronavirus, formerly in-person group activities like schooling and public meetings suddenly moved online. That transition made the impact of long-standing gaps in internet access across the state bracingly clear. Census data from 2018 show that over 1,235,000 people in Washington lack internet connections aside from cellphone data, with about 735,000 of those people lacking a data connection completely. Most of this gap is due to lacking financial resources, but many Washingtonians live in areas where broadband simply hasn’t been built.

We can look to community organizers and outreach practitioners who have historically worked with populations who have limited internet access for tools to bridge these gaps. Three potential approaches are:

- Text message campaigns that introduce the issue and connect people with next steps.
- Replacing or supplementing public meetings with websites and [online tools](#) designed for interactive learning and engagement.
- Recording and sharing videos of online public meetings.
- Community leader-directed outreach. Building relationships with representatives of the relevant community and following their guidance on best outreach methods.

2.10 Choosing Services and Service Providers

Trust is critical to effective community engagement and a currency that many agencies lack in public perception. In our analysis of barriers to community engagement, some of the key factors impacting trust included:

- Geographic, racial, and cultural representation in agency staff.
- Linguistic or cultural relevance of communication materials.

When engaging the community, the ability to listen and understand issues through their perspective is important. As a practitioner, you are responsible to provide a safe space and conducive environment, where community members can freely express their experiences, stories, and frustrations with government entities without fear of negative consequences. While professional training can be very beneficial, traits like emotional intelligence, humility, curiosity, adaptability, planning skills, and leadership outrank formal academic credentials or certifications when assessing the aptitude of community engagement practitioners.

While there is obvious overlap in skillsets, the skills and knowledge of successful communications staff and successful community engagement staff can differ in important ways. The primary goal of community outreach is to build trust with varying groups and elicit honest, engaged feedback to inform agency decisions and promote a two-way flow of information during decision-making. This differs from communications, which typically prioritizes providing a one-way flow of information through traditional media channels.

Key issues on this topic to include in an agency-specific community engagement plan:

- Develop community engagement services that are not static but rather determined in response to several factors, which are further developed in Determining Obligation, above:
 - Relevance of the issue to the impacted population(s).
 - Specific linguistic and cultural needs of the impacted population(s).
- Design services to impact the primary outcomes of the program or efforts.
- Establish standards of skills, experience, and knowledge for community engagement practitioners that value anti-racism and equity training, community outreach or organizing experience, cultural humility, and understanding of the specific cultures and communities at hand. Note that none of these skills are strictly tied to formal academic accomplishments or certifications.
- Develop engagement approaches that integrate community leaders and community members as partners in engagement.
- Consider whether your agency supports community engagement staff who represent the ethnic and cultural makeup of the population you serve. If not, work with your agency's recruitment and retention specialists on a plan to include such staff.

2.11 Training

Each agency is encouraged to develop a community engagement plan, and one recommended way to implement the plan is through a training program.

Key issues on this topic to include in an agency-specific community engagement plan:

Developing an agency-wide community engagement plan sets policy for your agency and communicates to staff and customers about engagement expectations and opportunities. A training program can assist with implementation by promoting awareness of the plan and teaching staff strategies and best practices for engagement. In addition to training agency staff about how to communicate the key functions of an agency with community, Diversity, Equity, and Inclusion (DEI), environmental justice, and cultural humility trainings are important core competencies for community engagement.

Relevant Tools & Resources

Reach out to peer agencies. They are often happy to share their plans, practices, experiences, and training practices. They may even have a program you can use as-is. Do online research into community engagement plans and training programs.

2.12 Policy and Legislative Development

All agency policies impact communities and populations differently, and can have unintended consequences unless impacted communities have an opportunity to contribute to policy development. It is important to apply the elements of your agency's community engagement plan when developing new or amending existing agency policies. This can lead to better policies as well as more positive public receptivity to proposals. In particular, developing agency request legislation and navigating input and amendments during legislative session can require specific planning to support community engagement.

Key issues on this topic that should be in an agency-specific community engagement plan:

- **Clarification of objectives regarding environmental justice.** The agency should review primary objectives for proposed policies, and referring to and applying the agency's environmental justice strategy if one is in place. These objectives should be clearly articulated.
- **A clear consultation and communication process in advance of legislative session:**
 - *Roles and responsibilities.* Clarify who are the primary contacts and how to communicate with them.
 - *Content.* Agency staff should have clear guidelines about what aspects of a draft policy should be shared and with whom.
 - *Timeline.* Ensure a clear timeline is provided that allows sufficient time for policies to be communicated about, understood, and for feedback to be provided (especially for smaller organizations with more limited resources and capacity)
 - *Review and responsiveness.* Agencies should have systems in place to record input, clarifying that main points have been understood. Suggestions should be thoroughly reviewed and considered. Agencies should plan to implement suggested changes where possible (this may at times require new ways of thinking or flexibility on the part of the agency), or propose alternatives when needed. Either way, follow up with stakeholders and articulate how the agency will respond to their input.
- **Consider offering remuneration** for the time community partners put into policy review.

- **A clear plan for engagement during legislative session**
 - *Key policy details.* It should be clear what parts of a proposed policy would need further engagement and review if amendments are proposed.
 - *Agreed points of contact during session.* Agencies should agree with community partners who is willing and able to review proposed amendments and respond in a timeline manner during legislative session.
 - **Refer back to objectives for quick turnaround decisions.** If agencies need to make immediate decisions during legislative session, they can refer back to the articulated objectives to ensure final policy details further these goals.

2.13 Agency Accountability and Responsibility

It is the responsibility of agencies to comply with, evaluate, and hold themselves accountable to these community engagement recommendations. There are two statewide entities that may help hold agencies accountable to community engagement, Results Washington and the future Office of Equity. The agency may also be accountable to ensure community engagement in achieving federal expectations, through funding or other relationships between state and federal entities. To build trust and ensure accountability with communities, agencies will maintain transparency and communication. For this part of the community engagement plan, we recommend the agency identifies mechanisms for evaluating community engagement work and reporting back to communities.

To center accountability as agencies write a community engagement plan, we recommend agencies evaluate its community engagement work and consider the following:

- How are highly subjective words like “meaningful” and “effective” used in the context of community engagement? Will it provide clarity for the agency to define these words within the community engagement plan?
- How will the agency know when the agency achieved “meaningful” or “effective” community engagement?
- Where are there pre-existing opportunities within an agency’s purview to expand community engagement to support the agency’s current work and obligations?
- Where is agency funding is coming from, and are there specific requirements for community engagement associated with that funding?
- How are agencies demonstrating the process by which they are incorporating and engaging communities in their decision-making processes?

Relevant Tools & Resources

- [Racial Equity Toolkit](#) (pp. 9-10)
- [Existing toolkits and example evaluations of government community engagement work](#) (p. 4)
- [WA Office of the Attorney General: Government Accountability](#)
- [Results Washington](#)
- [The Community Engagement Continuum: Outreach, Mobilization, Organizing and Accountability to Address Violence against Women in Asian and Pacific Islander Communities](#)

Appendix A, Public Participation Evaluation Tool

Public Participation Evaluation Tool

Site Information

Date:

Cleanup Process Stage:

Site Name:

Site Manager:

Public Involvement Lead:

Stakeholders:

Note for Environmental Justice Task Force reviewers:
This is a slightly modified example of a community engagement evaluation tool that is in use. This example is specific to one discipline (environmental cleanup) but could be developed into something more broad or tailored to fit agency-specific projects.

Best Practices and Assumptions

- We assess at a higher level of public participation in the absence of technical information and experience in the community.
- If it goes “bad,” what will we wish we had done at first.
- We will reassess at key decision points.
- This evaluation tool includes the defined cleanup site and the affected community (perceived or actual).
- We are assuming that all of our sites are difficult to communicate and may be complicated to cleanup.

Scoring System - Adapted from IAP2 Evaluating Public Participation

1-2 Very Low to Low – recommendation: at least inform.

2-3 Low to Moderate – recommendation: at least consult (public comment periods are consult).

3-4 Moderate to High – recommendation: probably involve.

4-5 High to Very High – recommendation: minimum Involve, consider opportunities for Collaborate or Empower if feasible

Assessment Question	Very Low	Low	Med	High	Very High
1. How much do major stakeholders (i.e. tribes, local government, local organizations, general public) care about the cleanup and the decision to be made?					
2. Proximity to other big or controversial projects.					
3. What degree of participation does the public appear to want?					
4. Impact of cleanup or investigation to people's daily life?					
5. What is the value of the site or the associated resources for the community? (aesthetics, economic, etc.)					
6. What degree is the risk or perceived risk of exposure off site?					
7. What is the level of environmental justice concerns? (linguistically isolated communities, EJ Index, demographics, workers?)					
8. What is the potential for public outrage?					
9. What is the legally optimal (MTCA, RCRA, DW Regs) level of public participation?					
10. Level of complexity that requires agency-wide policy or regulatory analysis (i.e. vapor intrusion, water quality standards, other regulations).					
11. To what extent do internal staff believe that the public could help improve the outcome?					
12. What is the potential for the public to influence the decision-making process?					
13. What level of media interest do you anticipate?					
14. What is the anticipated potential for political controversy?					
15. What is the capacity and level of resources that the community or organizations currently have to address this site?					
Count number of checks in each column.					
Multiply number of checks by the weight.	X1	X2	X3	X4	X5
Enter column score.					
Add total of all five column scores.					
Divide total score by the number of questions.					
Average score					

Outcomes:

Appendix B, Public Participation Spectrum

	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
PUBLIC PARTICIPATION GOAL	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
PROMISE TO THE PUBLIC	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision. We will seek your feedback on drafts and proposals.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will work together with you to formulate solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

Appendix C, Barriers to Meaningful Engagement

Barriers to participation

Community Engagement subcommittee, Environmental Justice Task Force

Winter 2019/2020

This list was developed with input from members of the Community Engagement Subcommittee, members of the Environmental Justice Task Force during its 1/14/2020 meeting, and members of the public attending the same Task Force meeting. This list is not intended to be static or definitive. Categories help organize a large list, and we recognize that many/most items in the list are connected and related to each other in complex ways. The bullet points are largely unedited transcriptions from contributors.

Systems of oppression

Agency culture and structures inherently reference, rely on, and reflect systems of oppression such as:

- White supremacy
- Settler colonialism
- Capitalist hegemony
- Patriarchy
- Christian hegemony

Access

To information

When printed materials are the central mode of communication, many people are excluded.

- Print materials that are unreadable
- Print materials unreadable for people who are older or sight-impaired
- The lack of large print, braille, interpreters
- Text-heavy documents/materials (not in plain English)
- Use visuals as much as possible to convey the message (instead of relying on heavy text, even if the text gets translated into other languages).
- Translated print materials (while important) does guarantee information access because some folks may not be literate in their native tongue or the translation vendor does literal translation (that does not accurately express the true meaning) or uses formal or complicated terms (versus colloquial word choices).
- Best practice in terms of translating text materials into other languages is to use “transcreation” instead of direct translation services. Transcreation is the process of adapting a message from one language to another, while maintaining its intent, style, tone, and context.
- Printed information sometimes becomes obsolete or outdated – hard to get up to date information.

Focus on English excludes people who speak other languages.

- Limited proficiencies (with English for example)
- Low quality translation/interpretation and English-only speaking staff who can’t assist
- When preparing translations or hiring interpreters, agencies can overlook indigenous languages like Purépecha or Mixtec languages, assuming Latinx people all speak Spanish. This extends into language variants, indigenous languages, and other linguistic nuances worldwide.
- Some populations (e.g., farmworkers injured on the job) need both translation/interpretation and ADA access to information.

To meetings

Arrangements to get to the meeting can cost more than the meeting is worth.

- Traveling to meetings that are geographically distant from the people impacted by the topic of the meeting
- Cost of travel
- Meetings not accessible for those living in rural areas
- Meetings not accessible for those without reliable cell service or internet connection
- Temporally and spatially accessible meeting spaces
- [Lack of] Childcare
- Inaccessible meetings: no food, no childcare, lacking transportation, lacking language interpretation
- Business/industry numbers and expertise in the room can be intimidating
- Legal status and fear of retaliation from a person in power (e.g., an employer). Meeting attendees/public comment respondents may not be safe speaking up.

The environment at the meeting can be unwelcoming or exclusive.

- People aren't sure if they are invited or welcome to the meeting
- Shame for not knowing what is going on
- For ethnically diverse communities, a conventional mainstream public meeting format may not be culturally sensitive or appropriate.
- English-speaking presenters at meetings with LEP communities may not have the training or knowledge on how to present while accounting for interpretation (they speak too fast, with jargon, etc).
- There may not be upfront work to help build knowledge capacity of the community around a specific technical topic before bringing them into a meeting (particularly an advisory committee type meeting where they will provide recommendations/inputs). Thus community members may not feel comfortable sharing ideas if they do not have the foundational background info first.
- The physical room arrangement can have some participants in more powerful seats than others. "galleries" in meetings might discourage participation.

Apathy/burden

Note that apathy can be claimed as a reason not to provide meaningful public engagement, when often the appearance of apathy is a result of systemic issues like distrust, choosing to use limited resources in systems that are more effective based on previous experience with community engagement processes, etc.

- People don't feel responsible for what's happening in their neighborhoods.
- Participation burnout – community members have already commented on an issue multiple times and do not see any improvements/response/actions
- [People] Feel like their voices don't matter or that the government doesn't care about them
- Difficulties prioritizing what to care about and invest time in
- People have more pressing issues in their lives
- Multiple agencies are trying to work in the same communities but are not coordinating among themselves to provide a more integrated engagement approach (Where it makes sense) that reduces redundancy.
- Energy needed to engage is overwhelming compared to other needs in individual's lives – need too make it easier to understand the issues and participate
-

Communication

Effectively communicating the issue and supporting information in a way that's understandable to a broad variety of people isn't prioritized.

- Difficulties prioritizing what to care about and invest time in: How can people find out what is meaningful for them?
- Effectively communicating why this work matters and how it affects Washington residents' daily lives, while keeping in mind that everyone is busy and has competing priorities
- The bureaucratization of communicating the message
- Technical language and jargon isn't understandable to the layperson
- Defined limitations of what is possible for the government to do are not clear so it is difficult to know how to make recommendations that are possible (e.g., what is the role of the government, what can they do within their legal limits?)
-

The engagement process and opportunities aren't effectively communicated.

- Can't figure out how or where to give comment(s)
- Be transparent early and throughout the program planning process the boundaries for the program that is set
- Meeting content requires better introduction for community member(s) to feel informed enough to participate (better educational materials in multiple languages and relevant to community perspective are needed as is an allotment of time needed for community engagement)
-

Potential for influence

While agency process may include community engagement, it does not support external influence on the decision making process.

- Inflexibility, unwillingness to change
- Government fear of losing power or control can shut down the public process
- State government norms – keeping up with the status quo
- Lack of follow up from the government
- Communities questioning whether or not they actually have power and if engaging with the government is a good use of their time as a result
- Waiting to work with communities until decisions have been made – informing communities about decisions, rather than involving communities early and often.
- Legislature provides predetermined decisions but expects community engagement to inform outcomes
- Norm that the technical experts know best, and community comments aren't "informed by science"
- Devaluing indigenous knowledge and traditional ecological knowledge that may come in the form of public comment compared to western science to inform processes and decisions; not creating space and time for incorporating TEK and indigenous knowledge early in the process
- For Tribes – the misconstrued notion that participating in a government's public engagement process can serve as a replacement for government-to-government consultation and tribal engagement.
- Pressure/power of conflicting interests from business/industry can be intimidating and seem aligned with government.

- Funds and time not set aside by government for community engagement on an issue puts the burden on communities to know the issue and when/how to engage and puts out message that it is community's problem and input is not desired.
-

Representation

- Government agencies working with a small group of communities, so their work is not actually representative of the community
- Agency staff don't represent community members, limiting trust and cultural/communication skills
- Nonprofit staff may not truly represent the communities they serve (are they actually from the community?) or community leaders may not represent all diverse voices within a community.
- Same folks who have easy access to participating in government's community engagement activities may show up multiple times in different events – so the same voice is continually being heard. Such folks have a voice to hear, but the government is not doing extensive outreach to engage a more diverse set of community members.
- Who can represent certain groups.
 - For example, some Tribal Nations may have specific procedures on who is able to represent them publicly (e.g. elected tribal leader, departmental staff, etc...). Having a tribal member present may not sufficiently meet the definition of engagement or representation for some or many Tribes.
- We [agencies] hear from a small group of very vocal people who may not be representative.

Process

- The fundamental goal is often to comply with the law or regulation, not to effectively engage communities.
- Evaluation of effectiveness isn't often prioritized. Agencies can perceive success as long as they aren't being sued or issued a formal complaint.
- The goal of the engagement isn't defined clearly to establish appropriate expectations for the community.
- The goal of the engagement isn't defined clearly to establish appropriate goals and tasks for agency staff.
- The decision-making process – how do we decolonize the decision-making process? How do we support power-sharing and community self-empowerment?
- Government staff with less authority not having the power to listen and make significant changes even if they would like to.
- Lack of working early and often with folks impacted the most
- [Lack of] Investing in black and brown communities
- Government not recognizing intersectionality [intersectionality of agency programs, how different agencies influence each other]
- Jurisdictional and sector/department silos
- Process of mutual learning and dialogue that builds relationship versus one-time listening session - Create or participate in opportunities for mutual learning between community and agency staff
- Determining funding and staff time needed for community engagement is not part of decision-making process
- The solution to the problem isn't the solution for everyone and may put some people at risk. For example, high nitrates in the drinking water well in a home for people who may risk getting evicted if they report it back.

Novel processes/results of engagement aren't accommodated in agency plans

- Lack of creativity or thinking outside of the box in terms of community engagement

- Identify creative avenues to help address key community recommendations that may fall out of your agency's program scope or authority.
-
- "Do meetings the black way" [Agencies expect all cultures to adapt to their culture, rather than meeting people where they are]
- How do we do more of something we're not used to?

Agency timelines do not accommodate change or the amount of time meaningful engagement and relationship building takes.

- Artificial deadlines – lack of understanding within gov. processes that deadlines are often more adjustable than they seem.
- Lack of empowerment of gov. employees to ask "what is actually driving this deadline? Where and how can we create more space to be responsive to/engaging of communities?"
- The government rushing the decision-making process, perception that the timeline is immovable.
- Sometimes the timeline is immovable – for legislative deadlines, budgeting, etc.
- Conducting an engagement as an afterthought or later in the process vs building it into the process from the very beginning and have it evolve throughout the process
- Ensure that there is a continuous loopback mechanism in sharing back with the communities how their input informed decisions, plans and tools.
- Agencies don't value the expertise of skilled community engagement staff (e.g., include them in scoping, budgeting, defining process needs).
-

Resources

Accurate amounts of time and money for meaningful engagement are not allocated when budgeting projects.

- Lack of budget or resources for community engagement efforts. For example, if people are being asked to travel or contribute significantly, there is often no compensation for their time, cost burden, or expertise.
- Government resources not allocated properly.
- Hire staff that reflect diverse lived experiences from communities that the agency/organization wants to serve
- Provide technical assistance to community grantees (especially small CBOs) to build their capacity in managing your agency's grant funding and reporting (but also identify areas of improvement in the contracting process within your agency to ensure that it is not overburdening the CBOs).
- Staff time not allocated for community engagement.
- The legislature doesn't respond well to asks for increased engagement funding.
- Resources means not just hiring a community engagement coordinator but investing in community leadership and civic engagement (e.g., community leadership boards)
- Barriers in state law can prevent funded/compensated participation in decision-making processes that cost money.
- The process and budget for projects that require/use community engagement is rarely developed with someone who has expertise in community engagement.

Sovereignty

- Sovereign Tribes may see government processes at a different level than what their sovereign status warrants. For example, most state-Tribal relations happen at a formal government-to-government process or through

formal consultation processes. If these processes are not elevated to the status of a Tribe's sovereignty, many Tribes will choose not to engage for fear of engaging being used against them.

Trust

- Community context – the historical relationship of the public with government agencies and how that leads to the current level of trust
- Lack of listening skills among agency representatives
- Be present in the community and support their community-led work, not just come into the community when you need something
- As a government staff not from the community, learn about and be sensitive the historical and current trauma that communities of color have faced
- Agencies are only responsible for bringing offenders to compliance rather than preventing injury.
- The public participation process often doesn't result in a different outcome.
- Agency staff from outside of a particular community can become pedantic in that community, describing "what it's really like" when they don't have direct experience and don't appear to listen to those who do, especially when agency staff come from a bigger city to regulate a smaller town.
- Agency decision-makers often don't have direct experience with the system they're working in (e.g., bus systems and public transportation). "Rules without relation lead to rebellion."

Types of knowledge

- Many agencies don't believe the public can provide meaningful input, and have the colonial mindset that only academically-oriented individuals can be the experts
- a balance needs to be established to provide the relevant technical information so that relevant input can be received – defining the goals, limitations, etc is important
- Don't value community engagement to invest resources to do it the right way or do it at all
- Real or perceived sense of what you need to be "competent" enough to participate
- Prioritizing quantitative or science-based data over qualitative data
- Evaluate the weight of public comments
- Which comments hold more weight?
- Are public comments actually valued?
- Perception that "we have the right people at the table" already and the lack of ability to see the gaps in participation/involvement
- Recognize and honor the expertise that each person brings to the table – either from the government or community – and that we are here to learn from each other.
- Indigenous knowledge systems are often multi-generational and are constructed and validated by different norms than Western Science.
 - Also considerations over the ethics of sharing culturally sensitive Indigenous knowledge, how it is being recorded publicly, and how it is being used.