



SAHF Racial Equity Policy Analysis Rubric: Example Workflows

Stewards of Affordable Housing for the Future (SAHF) has shared its Racial Equity Policy Analysis Rubric with its members and colleague organizations for feedback and further discussion. Our members and partners have asked for examples of how this tool is used in practice. To facilitate use of the rubric and opportunities to learn from our partners about how we may strengthen this tool, we are sharing the following examples of how we have used the rubric in our public policy work. These are examples of scenarios when we've used the tool and associated level of effort. This isn't the substance of our analysis because much of it is still a work in progress. We will continue to add examples and expect to share analyses conducted using the rubric in a standardized format after a pilot period.

Example 1

Draft Legislation

SAHF was presented with the opportunity to review, offer comments on and endorse a piece of legislation that was set for reintroduction.

As is the practice for such requests, review of the of the draft legislation was assigned to two junior staff with oversight from the SVP Policy. The Racial Equity Rubric was used as a framework for conducting the review of the document.

Pre-Work: A SAHF Policy Associate and Policy Manager conducted the prework together. The draft legislation was shared without significant background or context with respect to its intent or origins. This left staff with some questions that applied to the policy analysis broadly and to specific racial equity implications. The team identified some questions/knowledge gaps that would need to be addressed to complete a full analysis. (Duration: Approximately 1 hour)

Analysis: The legislation was then independently reviewed by the associate and manager and then they reviewed findings and assessments of individual domain areas together. (Duration: 1 hour) Staff met with senior leadership to discuss issues and arrived at an assessment of the bill overall and concluded that it has the potential to promote racial equity. (Duration: 45 Minutes)

Share Out: High-level assessment was shared with a SAHF member who brought the legislation to our attention and comments will be shared with congressional staff.

Level of Effort: 3-4 hours - approximately 2 attributable to use of rubric, primarily time spent reflecting on pre-work. SAHF would not typically ask two staff members to

conduct the full analysis, in this case it was a learning exercise. Analysis would typically be done by one staff member and discussed with another. The rubric itself is a framework for discussing the policy analysis, so the added effort is incremental. For SAHF this requires some formalization.

Example 2

Regulatory Comment Letter

SAHF responded to HUD's Paperwork Reduction Act Request for Information on Reducing Barriers to Accessing Public Assistance. This notice was seeking feedback on changes for forms and assistance that could remove or reduce barriers to residents accessing housing assistance programs, including by reducing burdens that HUD imposes on housing providers that participate in HUD programs.

For requests such as these SAHF solicits input from its members, from industry partners and insights from its own staff on potential comments.

Staff first reviewed the RFI. Given time constraints, member feedback was requested before the prework/analysis was conducted. The analysis was conducted before any response was formulated/outlined.

Prework: SAHF's CEO and Policy Manager conducted prework and an initial analysis together. Several opportunities to potentially advance racial equity through change were required, but additional information on whether changes were within the scope of this request were needed.

Analysis: The team continued with this analysis, noting that the prework indicated some opportunities for further research/education as the comment letter was developed. Given that this was a public comment letter about information collections, a few domains of the analysis were of particular interest. The team focused on how data could be better used and shared in the administration of housing assistance programs to help advance equitable implementation and overall program improvement. The team also identified resident voice and agency as a possible area of concern since we were unaware of any specific outreach efforts to residents as part of this process. The team will explore its own channels for promoting this opportunity to those working directly with resident advocates. The team acknowledged that the burdens created by these processes are experienced by people of color who constitute a large percentage of people served by these programs because of policies that have left them with

disproportionate housing challenges. The team further discussed how some policies and the systems and forms that implement them are grounded in a mistrust of residents – sometimes built in racist assumptions or narrative.

More broadly, the team assessed that some comments offered would have the potential to promote racial equity if well implemented, but that the nature of this opportunity may not offer sweeping or systemic change.

A draft letter has been produced and offered for member comment. It will be reviewed by senior staff under the seven domains a final time before submission.

Share Out: It is standard practice with SAHF’s regulatory comment letters. In our share out we expect to highlight ways in which existing policies do not promote racial equity and how recommendations have the potential to promote racial equity.

Level of Effort: 1.5 hours. One hour for preliminary prework and analysis and 30 minutes for final review. This is in addition to the time spent to draft the letter and gather input, which is standard practice.