



Submitted via email to EvaluationOfficer@doc.gov.

January 31, 2022

Office of the Under Secretary for Economic Affairs
US Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Dear Department of Commerce Evaluation Officer,

The Southern Economic Advancement Project (SEAP) is submitting comments regarding Federal Register Notice Vol. 86, No. 230 (86 FR 68630) - Request for Comments on the Execution of the FY 22/26 Learning Agenda by the Department of Commerce (DOC). The focus of these comments is on awareness, accessibility, and representation.

SEAP is a public policy and technical assistance organization focused on the 12-state Southern region. The South suffers some of the greatest economic disparities, disproportionately so due to the high concentrations of vulnerable populations as well as rural areas lacking healthcare access and the brittle nature of public infrastructures for health, social welfare, and economic security.

SEAP partners with dozens of organizations from small non-profits to state and federal government agencies on issues of economic security, healthcare, and climate. Our partners frequently request existing and new datasets. When providing federal data sources, we find that awareness of existing DOC data is often the first barrier. This is especially important at the local level where staff capacity is more limited than in large metro areas or at the State level. Knowing what data is available from the DOC, where to find it, and how to make use of it are consistent challenges.

Accessing data requires knowledge of how to locate data, how to navigate the DOC websites, and the appropriate technologies. Receiving the message "it seems you are using an unsupported browser" (data.census.gov when using the Safari browser), asking for contact information before seeing the data (Minority Business Development Agency), or only having one data file type, all reduce accessibility. In addition, offering



data and information in non-English languages would reduce barriers to accessing DOC data and provide a more thorough feedback loop.

Most importantly, the quality and usefulness of any data depends upon accurate representation. If the data does not reflect the diversity of our nation, it severely limits the effectiveness in providing equitable services.

RECOMMENDATIONS

Equitable Sustained Prosperity

SEAP has found, through surveys and other forms of outreach, that *awareness* is often the biggest barrier to government programs and services. Throughout November and December 2021 SEAP surveyed individuals receiving SNAP benefits in AL, GA, and MS about their greatest challenges during the pandemic. One common comment was to “help small businesses” and “make getting a small business loan easier”.

SEAP encourages a reduction of barriers to *access* business assistance to underserved communities and populations. Writing requirements in plain language, as well as non-English languages, and creating a digital interface that is secure and easy to use, such as the US Postal Service website for at-home COVID tests, <https://special.usps.com/testkits>, and offering non-digital services would greatly reduce existing barriers.

Creating working groups that are inclusive of race, ethnicity, and gender from grassroots organizations and local governments is recommended. These working groups would provide feedback to DOC on new and existing data as well as help socialize the use of DOC data. The working groups would also serve as knowledge sharing entities.

Data Availability and Useability

Perhaps the most pressing need is to learn more about historically underserved communities and populations. It is necessary to understand who these populations are and where they are located in order to provide appropriate services. Currently, this information exists in limited form. For example, the 2020 Census was the first time nation-wide information was collected on same-sex households and marriages. That is a start, but more is needed. Prior to the 2020 Census, questions regarding sexual



orientation and gender identity (SOGI), as well as Middle Eastern and North African (MENA) descent were tested though ultimately pulled. In addition, more information is needed on disabled persons and their lived experience. It is essential that these, and other underrepresented groups, are tested and codified on DOC surveys so that they are *represented*, their lived experiences are understood, and there is sufficient data to provide needed services.

SEAP encourages the DOC to work with trusted community leaders to understand awareness, accessibility, and representation challenges. A recent SEAP survey asked “Have you had any community or elected official reach out to you about how funding from the American Recovery Plan (federal recovery funding for COVID-19) should be invested?”. Ninety percent (90%) of respondents answered “No - no one has reached out to me”. The same survey asked “How do you usually receive information about your community?” Over half of respondents receive community information from social media, with newspapers a distant second, and community groups like PTAs and religious centers also included. Information from the federal government is not distilling down to local levels, but there are organizations like SEAP that can help.

Sincerely,

A handwritten signature in black ink, appearing to read "Maria Filippelli", is written in a cursive style.

Maria Filippelli
Data Director
Southern Economic Advancement Project