



ADMINISTRATIVE CONFERENCE OF THE UNITED STATES

**FORUM ON UNDERSERVED COMMUNITIES AND
the Regulation Process**

**Panel 5: Learning from State and Local Agencies’
Efforts to Engage with Underserved Communities**

November 22, 2021

TRANSCRIPT
(Not Reviewed for Errors)

Panelists

Jonathan Collins, Assistant Professor of Education and Political Science, Brown University

Linda Roman, Racial Justice Policy Advisor, Oregon Office of the Governor

Lisa Soronen, Executive Director, State and Local Legal Center

Dionne Williams, Deputy Executive Director, Colorado Department of Local Affairs

Neal Woods, Professor, University of South Carolina

Moderator

Beth Williams, Former Assistant Attorney General, Department of Justice Office of Legal Policy

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Transcription of Video

Panel 5

Video Runtime: 1:01:03

1 (Beginning of Audio Recording.)
2 MS. NOWACKI: All right. Hi
3 everybody. Welcome. My name is Kazia
4 Nowacki and I'm an attorney advisor with
5 ACUS. Throughout the month of November, ACUS
6 has produced a number of panels as part of
7 this forum on underserved communities and the
8 regulatory process. The panel is the fifth
9 one in our series, and this one we'll be
10 focusing on Learning from State and Local
11 Agencies' Efforts to Engage with Underserved
12 Communities. To find out more information
13 regarding this forum and to view the previous
14 panels from this forum, you can go to ACUS,
15 you can go to ACUS.gov.

16 I'd now like to introduce our
17 moderator for this panel, Beth Williams.
18 Beth served assistant attorney general of the
19 Justice Department's Office of Legal Policy
20 from 2017 to 2020. While there, she led the
21 judicial nomination process for the
22 Department, assisting in the selection and
23 confirmation of over 230 Article 3 judges.

24 She served as the primary policy
25 advisor to the attorney general and the

1 deputy attorney general, and as the chief
2 regulatory officer for the Department. Thank
3 you, Beth. Now to you.

4 MODERATOR: Great. Thank you so much,
5 Kazia. And on this week of Thanksgiving, I
6 just want to say how thankful we are to all
7 of you for joining and, of course, to ACUS
8 for putting this terrific forum together.
9 And, obviously, we're also thankful for Matt
10 Wiener's terrific leadership and for Kazia's
11 work in organizing this.

12 And now, I also want thank and
13 introduce our distinguished panelists. I'm
14 going to introduce each panelist, and then
15 that panelist will offer a few brief remarks.
16 As you think of questions, as the panelists
17 are speaking, please feel free to type them
18 in the chat. And then we'll be able to get
19 to them toward the end of the session.

20 So, without further ado, I am pleased
21 to introduce Professor Jonathan Collins.
22 Jonathan is an assistant professor of
23 education, political science, and
24 international and public affairs at Brown
25 University, where he also holds research

1 affiliations within the Brown University
2 Annenberg Institute for School Reform and the
3 Brown University Taubman Center for American
4 Politics and Policy.

5 His research examines how democratic
6 processes can improve the educational
7 experiences of students in low-income and
8 minoritized communities, and the way in which
9 people of color, particularly African
10 Americans, engage with American democracy.
11 Professor Collins?

12 MR. COLLINS: Thank you for the
13 introduction. I want to thank you to ACUS
14 for inviting me and having me be a part of
15 this larger conversation. And so, you know,
16 what I want to talk about for a couple of
17 minutes are just -- is just a bit about the
18 work that I do and kind of what I've been
19 finding recently. And then how I think this
20 applies to thinking about regulatory systems,
21 engaging with communities of color, and kind
22 of being more thoughtful and precise about
23 how we engage with these communities in
24 particular.

25 And so, you know, I'm a political

1 scientist by training. My academic
2 background is in political science. I have a
3 PhD in political science from UCLA. But my
4 focus is primarily centered around education
5 politics and policy, and how it -- and how we
6 should think about education politics and
7 policy through the lens of both race and
8 democratic theory.

9 And so, you know, one of the big kind
10 of underlying -- I would say sort of
11 critiques that my work has been looking to
12 offer is this idea that when we look at low
13 level of civic engagement, especially in low-
14 income and communities of color, we tend to
15 focus on disparities between groups. We tend
16 to look at how African American are
17 participating or engaging in the electoral
18 process or even non-electoral processes
19 relative to their white counterparts.

20 So, we look at Latin-X communities and
21 offer these same questions. We look at low-
22 income communities and, again, we offer these
23 same questions about disparity.

24 What I try to focus on instead is
25 thinking about the work that institutions are

1 doing or are not doing. So, are
2 institutions, themselves, committed to
3 engaging with our communities? Are they
4 committed to doing them in substantive ways?
5 Can we think about and sort of imagine or
6 reimagine ways in which institutions should
7 go about this process of engaging with our
8 communities?

9 And so for me, you enter this idea of
10 -- or these ideas of participatory democracy
11 and public deliberation. And so,
12 participatory democracy is this idea that's
13 been brewing in -- within democratic theory
14 for a while, and it sort of reduces to the
15 idea that direct participation between
16 citizen stakeholders and their
17 representatives is arguably the purest form
18 of democracy. Where then out there's this
19 actual direct contact happening.

20 Deliberation and deliberation theory
21 adds a sort of a caveat to that and argues
22 that and argues that it has to be sort of
23 communicative and rooted in dialogue. So,
24 you want to have back and forth exchange
25 happening between members of the public and

1 their representatives, and then you want that
2 conversation to be rooted in justification
3 and public reason. People providing
4 justifications for the decisions, rationale,
5 logical discourse.

6 And so, we turn to communities of
7 color -- well, there seems to be -- there
8 seem to have been two things happening. One,
9 the assumption that engagement can't happen
10 here. And then two, the assumption that the
11 idea of reasoned discourse is also not
12 possible. And what I've been trying to do in
13 my work is to push back against those two
14 ideas. And so, I -- I've been studying
15 initiatives or even designing my own that
16 target these participatory and deliberation-
17 based processes in communities of color.

18 A most recent initiative, I partnered
19 with the Central Falls Public School
20 District, which is a mostly Latin-X school
21 district right outside of Providence, here in
22 Rhode Island. And we took -- we got the
23 district to take some of their extra funding,
24 their federal relief funds for COVID, and use
25 this for -- towards the participatory

1 budgeting process.

2 So, what we did was what -- we
3 selected a subgroup of delegates from the
4 community. They put together proposals based
5 on a larger survey that they collected of
6 people who live in the Central Falls
7 community. They developed those proposals in
8 combination with the District and some
9 District bureaucrats to get a sense of how
10 the money could be used and what ways it
11 could be spent. And then they put together a
12 final election day, where community members
13 from all across the city could come into the
14 high school gym, see the proposals on
15 display, talk to their delegates who have put
16 them together, and vote on the proposals that
17 they ultimately felt would help the school
18 district more.

19 And so, you know, the short victory
20 here was the fact that most of the community
21 members ended up endorsing investments in
22 extra-curricular programming, which on our
23 surface, if we talk to district leaders
24 beforehand, this wasn't necessarily something
25 that they had on their radar. So, it sort of

1 changed the trajectory of the agenda that the
2 local district operated under.

3 But I think the bigger things were the
4 strengthened community ties that we noticed
5 amongst the delegation, the feeling of
6 empowerment and engagement and involvement
7 that we noticed from them as well. And the
8 sense that at the end of this process, there
9 was a stronger appetite for more, for more
10 money to be decided through this kind of
11 process, and for this process, in and of
12 itself, to continue not only through
13 education but other way in which the public
14 operates.

15 And so, I tell this story about this
16 research endeavor just to sort of lay a
17 breadcrumb towards a larger trail. And that
18 larger trail leads to this idea that we need
19 to be thinking about how we can substantively
20 engage communities of color and processes
21 that are rooted in direct participation in
22 this idea of deliberate discourse.

23 And I think this is the next step in
24 branching out and really making government
25 agencies even more useful and productive,

1 especially in the communities that need the
2 most. And I'll leave it there.

3 MODERATOR: That's terrific. Thanks
4 so much. And thank you for that concrete
5 example. I think that really gives some meat
6 to what we're talking about today.

7 So next, I'll introduce Linda Roman.
8 Linda is the deputy health policy advisor at
9 the Office of Oregon Governor, Kate Brown.
10 She also serves as the coordinator as of the
11 Racial Justice Council's Health Equity
12 Committee.

13 Prior to her work in the governor's
14 office, she worked to expand access to health
15 care and held leadership roles with the
16 Oregon Latino Health Coalition and the Oregon
17 Health Equity Alliance. During her time
18 there, she spearheaded state-wide policy
19 campaigns to secure over \$56 million for
20 health care coverage for undocumented
21 children and immigrants. Linda?

22 MS. ROMAN: Hello everyone, good
23 afternoon. My name is Linda Roman. And
24 recently this year, I've had a change in
25 role. I'm actually the Racial Justice

1 Council policy advisor in the Office of
2 Governor, Kate Brown, in Oregon.
3 I'm excited to be with you all today
4 to talk about the work of the Racial Justice
5 Council. We started the council last year in
6 2020, where we really just began to be
7 intentional about how we listen, how we
8 respond to, how we engage with communities
9 across the state in Oregon around racial
10 justice.

11 Since we have been meeting close to
12 over a year now, we have advanced a policy
13 agenda and also a budgetary agenda. And the
14 core goal of the Racial Justice Council is
15 really to peel a couple layer around access
16 to the governor, access to the executive
17 branch, and to agencies. And to engage with
18 communities before we develop our policy
19 platform and budgetary platform.

20 What we've been able to do is really
21 peel a layer of so much of how this policy
22 and budget framework usually happened within
23 our agencies, and also within processes that
24 may not be accessible to all communities.
25 And so, we have taken an approach of really

1 peeling that layer off and opening and
2 engaging with communities on racial justice.

3 We have advanced a legislative agenda
4 over the last legislative session and have
5 focused our work in reviewing and
6 implementation of those budgetary items.

7 It really is a -- I would say an on-
8 going conversation. It's definitely not a
9 one and done type of engagement where we
10 engage with communities on various, different
11 topics that range from implementation of a
12 certain policy to even, you know, big things
13 that are happening at the governor's office
14 that we want to make sure that we advise the
15 community.

16 Overall, we engage with close to 250
17 individuals. We have a racial council that
18 is chaired by the governor. And then from
19 there, we have specific subject matter
20 committees that range from 30 to 40 or 20 to
21 30 different people across the state. These
22 committees are -- have representation of
23 various communities, various expertise and
24 representation from across the state.

25 The other thing that I'll say is we --

1 as part of the intent of the Racial Justice
2 Council, we wanted to move beyond the
3 informed. Many times when government
4 entities or government agencies, we come to
5 communities to talk to them when we're
6 informing them of our work. We're sharing
7 what we're doing. We want to get their
8 feedback.

9 But for the most part, the cake is
10 already baked, to use an analogy. What we're
11 doing is starting that process before -- the
12 Governor Brown uses an example of, you know,
13 it's part of the recipe. Racial justice has
14 to be part of the recipe and it has to be a
15 central component of our work.

16 The other piece that I did want to
17 share is we recently passed a bill, House
18 Bill 2167, to codify the structure within the
19 Executive Branch. What this bill does, it
20 continues the commitment for future governors
21 and future -- and the work of agencies to
22 continue to engage with the Racial Justice
23 Council. So, it's now in statute.

24 It requires our agencies to engage and
25 support the work of the Racial Justice

1 Council and to also participate in a process
2 with them to develop their future budget
3 requests that they submit to the governor
4 later on.

5 And so, what this means is that our
6 agencies will be engaging with community
7 before they build out their budget. And
8 that's a really important step to ensure that
9 we are integrating key improvements to the
10 way that we fund our work with our agencies,
11 and also that we make investments that are
12 strategic in closing disparities, but also
13 investments that create opportunity and the
14 ability for all communities in Oregon to
15 experience wealth and joy and health and
16 housing.

17 So, that is really the focus of the
18 Racial Justice Council. And with that, I'll
19 turn it over to Beth.

20 MODERATOR: Great. Thank you so much,
21 Linda. All right. Next, we have Lisa
22 Soronen. Lisa is the Executive Director of
23 the State and Local Legal Center. In this
24 role she files amicus curiae briefs to the
25 United States Supreme Court on behalf of

1 members of the Big Seven, a group of non-
2 partisans, non-profit organizations made up
3 of U.S. state and local government officials,
4 in cases involving federalism. And she
5 organizes moot courts for attorneys
6 representing state and local governments at
7 the Supreme Court.

8 She also is a resource to Big Seven
9 members on legal issues affecting state and
10 local government, particularly at the Supreme
11 Court level. Prior to joining the SLLC, Lisa
12 worked for the National School Boards
13 Association, the Wisconsin Association of
14 School Boards, and clerked for the Wisconsin
15 Court of Appeals. Lisa?

16 MS. SORONEN: Thank you, Beth. It's
17 great to be here with all of you today. So,
18 I'm going to focus on my remarks on the
19 regulatory work that I did at the National
20 School Boards Association. I assume,
21 listening in the conversation, is a lot of
22 lawyers. And so, at the 10,000-foot view,
23 what I would say is, and probably this is
24 true for most of us, administrative law was
25 one of the hardest classes in law school

1 because it involved things like, you know,
2 what should happen to planktons and other
3 things that I didn't really know anything
4 about.

5 But more to the point, I left the
6 class thinking that the regulatory process
7 was odd and complicated. And my education
8 didn't prepare me very well for what I
9 ultimately ended up doing, which was spending
10 about ten years of my career regularly
11 responding to requests for comment on federal
12 regulations from federal agencies.

13 So, for about a ten-year period I did
14 almost all of the commenting on the federal
15 regulations for the National School Boards
16 Association. And I was lucky to be able to
17 do it. We had four lawyers. So, there was
18 enough resources. Commenting on anything
19 ranging from things that went on in schools
20 that affected students to employment
21 regulations. Those sort of thing.

22 Now, it may seem to many of you
23 listening that schools wouldn't per se seem
24 like an underserved community. But if you
25 think about it this way, Wisconsin, for

1 example, has 426 school districts. That
2 means, like, these school districts are tiny.
3 And if you think about this, like, the
4 Department of Labor is going to propose
5 regulations on the Fair Labor Standards Act
6 that are going to affect every single
7 employer in the United States. If schools
8 didn't speak up, you know, their voice
9 wouldn't be heard.

10 So, like I said, we're not a
11 conventional underserved community. But, you
12 know, the analogy is sort of there.

13 So, what I did, basically, was I --
14 well, let me back up and say I worked with 50
15 state associations. They actually had
16 created the National School Boards
17 Association. And one of the things they
18 struggled with was staying on top of federal
19 regulations generally. So, these attorneys
20 working for, like, many National School
21 Boards Associations in their state.

22 So, I literally started reading the
23 Federal Register, and looking and seeing what
24 affected schools and saying these are the
25 things we should comment on.

1 I ultimately put a publication
2 together that followed everything in the
3 Federal Register that was relevant to
4 schools. And I'll say this, I don't ever
5 remember being contacted by a federal agency
6 when a regulation was proposed or before it
7 was proposed that affected schools. I
8 don't -- it was ten years ago and I wasn't
9 super high up in the organization. So, it
10 maybe that other people more important than
11 me were contacted and no one told me.

12 But, I mean, but I did the work and
13 it -- so, anything that I did I had to sort
14 of figure out myself, which isn't too much to
15 ask but it maybe, you know, kind of explains
16 where some of these national organizations
17 are coming from.

18 So, all good conversations are -- do
19 things in threes. So, I will make three
20 recommendations. But it's important for me
21 to have this caveat, which is that the most
22 important work that you would do to serve --
23 to help serve underserved communities
24 probably doesn't involve national
25 organizations. But that's my area of

1 expertise. So, that's what I want to sort
2 of -- I want to comment on.

3 So, I think to the extent that there
4 are national organizations that represent the
5 people you want to hear from. It may be the
6 case that you don't hear from them because
7 they don't know what you're doing. And they
8 don't know how to react to what you're doing
9 and how to be a part of the process. I
10 think, you know, at a minimum, it would have
11 been amazing had I, in the job that I had,
12 not to have found all the regulations myself
13 and figured it out sort of from ground one.
14 Like, how do I comment? What do I do? How
15 does this process work?

16 So, to the extent that you're an
17 agency or you're dealing with an agency
18 that's dealing with an underserved community
19 that is represented by national organization,
20 if you had some proactive interactions with
21 that national organization to let them know,
22 hey. We're doing this. I think that would
23 be helpful.

24 I think the other thing, too, is doing
25 regulatory work is very special work. You

1 have to have the time, the resources, and the
2 imagination for it. And I think a lot of
3 even well-funded national organizations,
4 unless they have not just a lawyer, but
5 someone who is skilled at gathering
6 information, summarizing information -- I
7 built the whole thing from the ground up.

8 And I think, like, it would have been
9 easier had I walked in on day one of my job
10 and was, like, you know, this is the process.
11 This is sort of how you do it.

12 And, you know, training national
13 organizations to respond to you may sound
14 crazy, but on the other hand, if you're in
15 the national organization and it has no
16 structure to do that, either someone has to
17 come up with it or it won't get done.

18 The last comment I would make is this.
19 And this has more to do with substance when
20 it comes to regulations. So, I only got
21 involved in things after a rule was proposed.
22 And I definitely did a lot of work. It was
23 very gratifying, where I would make
24 suggestions and the agency would listen or at
25 least would say I'm not doing what the

1 National School Boards Association said for
2 this sort of reason.

3 But what frustrated me was that often
4 times the changes in the regulations were
5 more or less at the margins. And they
6 weren't the regulations that I would have
7 necessarily created had I been starting from
8 scratch. And I -- what I saw in regulations
9 kind of over and over again, and this
10 (inaudible) to schools. It doesn't
11 necessarily link to the underserved
12 communities that your probably most
13 interested in. But I think the point will be
14 the same.

15 What I saw over and over again, was
16 that regulations assumed that they were
17 regulating large entities with a lot of
18 resources. And the regulations that were
19 selected or proposed, rather proposed, made
20 sense maybe a little bit in that world. But
21 I was saying over and over again, no, no, no.
22 We don't have a lot of resources and we're
23 not very big.

24 So, you come up with a system that
25 works for an imaginary organization that

1 you've created or at least one that doesn't
2 represent the people that I work for. And I
3 think had I been able to have made a
4 difference before the proposed regulations
5 were proposed, you know, I always felt like I
6 was working from behind and I was behind.
7 So, those are my -- that's my experience and
8 my suggestions.

9 MODERATOR: That's great. Three
10 points like a good Supreme Court advocate.
11 Thanks, Lisa.

12 So, next we have Dionne. Dionne
13 Williams is the Deputy Executive Director at
14 the Colorado Department of Local Affairs.
15 The Department of Local Affairs works in
16 partnership with local governments and
17 communities statewide to provide funding for
18 projects, disaster recovery relief,
19 affordable housing, community planning, and
20 equitable administration of property tax law
21 throughout the state.

22 Prior to joining the Department,
23 Dionne served as the Executive Director of
24 Denver's Office of Children's Affairs and had
25 leadership roles in several Denver agencies.

1 She's an advocate for using the resources of
2 local government to promote equity, remove
3 barriers, and ensure every member of the
4 community is included in long range plans.

5 MS. WILLIAMS: What I want to say
6 today is really kind of pulling together what
7 several other people have mentioned. And I
8 come to this state relatively recently having
9 worked for a number of years at the local
10 level and I think that gives a really
11 interesting perspective in seeing how sort of
12 the regulatory environment trickles down to
13 the local level and seeing how it works and
14 also how it doesn't work. And especially, in
15 communities of color when we're talking about
16 engagement and thinking about that regulatory
17 framework.

18 What I would say, and I'm kind of
19 jumping off what Lisa was just talking about,
20 is the earlier you can engage and the more
21 you could really think about how communities
22 of color perceive that federal environment, I
23 think the more successful you are.

24 A lot of times what I think works
25 really well is when you understand that for

1 underserved communities, everything is local.
2 Everything really is about what's happening
3 within that community and that they don't
4 really necessarily resonate very well with
5 sort of that federal way of looking at
6 regulation and rulemaking. That kind of
7 thing. But everything is really happening at
8 the local level.

9 And you have to engage early and you
10 have engage with what they really need and
11 not necessarily from this, what I kind of
12 think of is the field of dreams approach,
13 where you build it and they'll come. You
14 know, you build a service, you build a
15 program and you just turn it on and people
16 are supposed to show up and utilize it. That
17 doesn't really work very well.

18 And what works better is if you really
19 think about engagement from a perspective of
20 what you're listening to, I listen to what
21 people need and thinking about how are you
22 building that into rulemaking. How are you
23 building that into regulatory framework and
24 engaging from that level early enough in the
25 process where what you're delivering is

1 really more of what people are going to
2 actually utilize. I think that's actually a
3 better for engaging underserved communities.

4 I've seen a lot of times where you
5 will have some sort of a federal program or
6 regulation come down the stream at the local
7 level and people wonder why people aren't
8 taking advantage of it. Why isn't this
9 working? What are those barriers?

10 And it's because that engagement
11 didn't really happen or it happened too late.
12 And a lot of times it's happening in
13 communities of color. And I think it's
14 happening because that engagement was poor or
15 not existent. And I think that's probably a
16 frustration that Lisa is pointing out and
17 that's why.

18 I also think that you have to think
19 about sort of what that technical assistance
20 looks like in communities when you're talking
21 about engagement and sort of that regulatory
22 environment. If we really want to do a
23 better job of engaging, we have to understand
24 sort of translating for folks what that
25 regulatory framework is and how that makes it

1 into local communities and who are the people
2 who are showing up and advocating.

3 How do we make sure that we have the
4 right voices at the table when we're talking
5 about doing that sort of engagement and doing
6 that sort of representation? You know, who
7 are the ones who are translating what
8 regulations look like?

9 So, when we're doing things, like,
10 rulemaking, for example, then we want to make
11 sure that people are represented, you know,
12 from a school district or in a particular,
13 you know, zoning meeting or that kind of
14 thing. You know, who is actually
15 representing the local communities and how
16 knowledgeable are they and how are they
17 getting prepared to do that kind of
18 representation and bringing that to the
19 table.

20 I think one of the things that's great
21 about having an organization like Local
22 Affairs, which is kind of unique that we have
23 in Colorado is that we're able to sort of
24 bridge that gap between local government and
25 local communities and state agencies and the

1 federal government in rolling out programs
2 and kind of navigating between the federal
3 regulations trickling down to the local
4 level.

5 And so, when you have an organization
6 like Local Affairs and you have staff that
7 are able to sort of navigate that process, I
8 think it's really helpful and we have more
9 success in then creating that sort of bridge
10 for engagement.

11 So, the more that you have those kinds
12 of organizations, I think the more success
13 that you'll be able to have. But I think the
14 earlier that you can engage and the more you
15 can embed that into your processes, the more
16 success you'll have in really bringing along
17 communities of color and underserved
18 communities in these types of regulatory
19 frameworks. Thank you.

20 MODERATOR: All right. Thanks,
21 Dionne. And finally, we have Professor Neal
22 Woods. Neal Woods is a professor at the
23 University of South Carolina where he teaches
24 courses on public policy and public
25 administration.

1 His research focuses on how political
2 and administrative institutions affect policy
3 outcomes, especially in the areas of
4 environmental policy and regulation. He has
5 published over 30 articles on these topics
6 and has won various awards for his research
7 in writing from the American Political
8 Science Association. Neal?

9 MR. WOOD: Thanks, Beth. And thanks
10 to ACUS for inviting me to this panel. It's
11 just really interesting. You know, like,
12 Jonathan, I'm a political scientist. I study
13 regulatory process, particularly at the state
14 level in the U.S. And I guess I'm going to
15 frame my opening remarks in terms of
16 reaffirming the value of this entire endeavor
17 through the lens of legitimacy.

18 And legitimacy is important for
19 administrative agencies because, you know,
20 they occupy a unique role in American
21 democracy, where they don't have the normal
22 mechanisms that we usually think of as a
23 party legitimacy to call it decisions because
24 we don't have any electoral connections a lot
25 of times. And so, we can't reward or punish

1 administrators based on policies decisions
2 that they make through the normal electoral
3 means.

4 And this has led a lot of people to
5 have concerns about the democratic legitimacy
6 of the administrative state just in general.
7 And there's been a lot of talk in legal
8 circles and academic circles about, you know,
9 the processes by which we can give
10 administrative decision making more
11 legitimacy. And the typical suggestions are
12 to open the process up to more participation.

13 And so, there's a general perception
14 among a lot of folks that procedural
15 openness, procedural fairness -- these are
16 the kinds of things that give agency decision
17 making legitimacy. And this is embodied in a
18 lot of work, including in some papers that
19 ACUS has put out there about, you know, the
20 ways that we can impart greater legitimacy to
21 decisions that are made by administrative --
22 folks in administrative agencies through
23 administrative processes.

24 But I would say that there's an
25 increasing recognition among political

1 scientists that procedural openness, in and
2 of itself, is probably not enough. And that
3 it's not necessarily the openness of the
4 procedures themselves, but that it's how
5 these procedures are used in terms of who
6 participates and the way that this
7 participation manifest itself in terms of
8 whether it's really a dialogue or not and
9 these kinds of things.

10 These are the kinds of things that
11 tend to matter more, generally speaking, in
12 terms of public perception of legitimacy of
13 agency decision making and just open
14 procedures themselves.

15 And so, the relationship between
16 procedural openness -- and at the federal
17 level in the United States, it's the classic
18 example of this is the notice and comment
19 period process, right? And so, everyone has
20 an opportunity to present comments. And a
21 lot of discussion goes into how do we get a
22 broader representation among commentators.

23 And part of the reason that we have
24 this process, you know, part of it is to make
25 better decisions. But part is also to give

1 some legitimacy to this process. But
2 experimental work in political science as
3 very recent that's focused on this issue
4 since it tends to give the indication that
5 this legitimacy and imparting part of this
6 process is more complex than just opening it
7 up to people.

8 In fact, if you give people -- and I
9 have done some of this research. If you give
10 two conditions to survey respondents, one in
11 which if you clearly lay out that this
12 process was open to everyone and that there's
13 widespread participation, et cetera. And
14 then in another, where you don't say anything
15 about that at all, you don't have any
16 differences in legitimacy perceptions, at
17 least in some of these studies, including
18 some of the ones that I've done. They come
19 to that conclusion.

20 But what does matter in some studies
21 is the diversity of the stakeholders that are
22 consulted. And so, that -- if you indicate
23 that there was a wide range of interests that
24 are consulted, and this includes people on
25 both side of the issue, and this includes

1 people who might be disadvantaged in some way
2 or something like that. Then you get a
3 legitimacy benefit.

4 And so, it's the diversity of
5 stakeholders consulted. It's the possibility
6 of deliberation among stakeholders, and it's
7 the overall transparency of the process that
8 tend to lend legitimacy research suggests.
9 And so, that gives, I think, further
10 indication of the importance of trying to
11 open this process up and get more
12 participation from underrepresented groups.

13 MODERATOR: That's great. Well, now,
14 we'll open it up to questions. And just as a
15 reminder, if you have any questions for our
16 panelists, please put them in the chat and
17 we'll get to them at the end. But I have
18 some questions just to start with.

19 And so, I'll pick up on what Neal
20 said. You know, you were talking, Neal,
21 about the notice and comment period and the
22 federal rulemaking and how that works. And
23 so, I was wondering if you could talk a bit
24 and then hopefully, we could get Dionne and
25 Linda, too, to add in about how state and

1 local agencies might differ from the federal
2 government with respect to regulatory policy
3 making and how does that affect underserved
4 communities.

5 I think a lot of our audience for ACUS
6 is often federal policy makers, either in
7 agencies or federal academics who are
8 studying these. So, can you talk a little
9 bit about to the differences with state and
10 local?

11 MR. WOODS: Yeah, I'll be happy to
12 talk about that. And so, some of the
13 research that I've done has looked
14 specifically at these two different
15 mechanisms that are employed by state
16 agencies in the course of their rulemaking.
17 And I have some slides that I had prepared to
18 present about this but I'm on a different
19 laptop for technical reasons. So, I'll just
20 tell you some of these differences.

21 Basically, in my research I divided
22 them up into a couple of different areas.
23 One in which I called public access and one
24 of which I called public notification. And
25 so, public notification would consist of

1 things that are required of states. Usually,
2 in state administrative procedure acts,
3 although, sometimes these are required in
4 other state laws or executive orders.

5 But required of just generally across
6 state agencies in terms of who they need to
7 inform, the mechanism by which they inform
8 people, and the length of time they have to
9 respond, essentially.

10 And so, the federal level, of course,
11 we have to publish rules in the Federal
12 Register and that's not necessarily true at
13 the state level. So, at the time I did this
14 -- just there's a caveat here, these data are
15 as of about 2007. So, they're a little bit
16 dated. And there probably have been some
17 changes.

18 But as of that time, 35 states out of
19 the 50 did require to be in the official,
20 published in the official state register but
21 the other 15 didn't. And two or three
22 states, depending on kind of how you count,
23 basically, had no requirement at all or, you
24 know, you just -- the requirement was to mail
25 it to an interested person if they're

1 interested.

2 Yeah, there were 13 states that
3 required it to be posted in newspaper. And
4 so, there was some kind -- sort of newspaper
5 announcement that was required in the state
6 APA or wherever.

7 This is one thing that I think has
8 probably changed since 2007. So, I didn't,
9 at the time I compiled these data, I didn't
10 look at any requirement in terms of posting
11 on the Internet. And I suspect that that's
12 more widespread now than it was at that time.

13 I looked at the amount of time that
14 people had respond to these things. The
15 minimum lead time that was allowed for
16 responses to these calls for comments, that
17 there was nine states that had a lead time of
18 that required up to 20 days, 29 states up to
19 30 days, and 12 that had more than 30 days.
20 I believe that the most was 100 days, which
21 might have been in Tennessee, but I'm going
22 from memory there. So, I might be wrong.

23 And so, there was wide variation in
24 that. There was wide variation in the delay
25 before rules become effective. So, some of

1 them were effective immediately upon
2 adoption. That a state agency could
3 promulgate a rule and that day start
4 enforcing it in theory. And then they went
5 up to about over 20 days.

6 So, all of that I considered sort of
7 notification kinds of things. I also looked
8 at access mechanisms and the kind of, sort of
9 quintessential public access mechanism would
10 be the opportunity to present written
11 comments to the agency, which is, obviously,
12 guaranteed at the Federal Level for most
13 rulemaking.

14 At the state level, it's usually
15 guaranteed as well. At the time I did this,
16 47 states had a requirement for -- and I
17 believe it's 48 now. The two states I
18 believe that do not require agencies to
19 provide an opportunity for written comment
20 are Michigan and New Mexico. And -- but
21 beyond this, there are a variety of other
22 things that states could require state
23 agencies to do.

24 So, 30-some states require them to
25 have the opportunity to have a public hearing

1 before adoption. Let me see if I get this
2 right. I said 30-some odd. I think it might
3 be 30 states that do require that. And so,
4 there are some requirements for public
5 hearings. There are some requirements that
6 states impose on state agencies to promulgate
7 a rule upon request by the public. The
8 public petitions them to do that.

9 There are states that require them to
10 do a cost-benefit analysis of a rule if
11 there's a public petition requiring them to
12 do that. There are states that require that
13 the public may petition an entity reviewing
14 the rule, to review a rule, such as, an
15 entity in the governor's office or in some
16 cases, the state legislature to review an
17 existing rule to determine its applicability
18 or legality.

19 And so, there are a variety. That's
20 really a very broad array of different
21 mechanisms that states give their citizens to
22 participate in the rulemaking process.

23 MODERATOR: That's great. Thanks.
24 And Dionne or Linda, could you talk a little
25 bit to your state processes and how they

1 might differ from the federal government
2 regulatory process?
3 MS. ROMAN: Yeah, absolutely. I can
4 share here. So, we -- with the Racial
5 Justice Council, we have -- we've asked them
6 if there are specific rules or implementation
7 processes that they wanted to, especially,
8 track and monitor. We recently have been
9 tracking a restorative justice program that
10 we recently funded over the last year.

11 And there have been a lot of
12 discussion around this program because it's
13 actually the first time that our state has
14 funded a restorative justice program that is
15 centered around community investments and
16 really moving away from a carceral type of
17 restorative model.

18 And so, we have -- what we've done is
19 we've talked extensively with the agency
20 that's in charge of implementing and
21 developing a process for the administrative
22 rule. We've asked them, actually, within the
23 statute that created the rule and the
24 program, there's a piece around community
25 engagement.

1 So, we've been working with the agency
2 on the backend to help design what that
3 process could look like. Because there was
4 so much interest in this, we've also had a
5 handful of members actually participate in
6 that process.

7 And what's been great is, you know, as
8 an example is the agency that has been
9 leading the process of feedback and for the
10 rule for implementation. They've actually
11 been keeping us updated about the progress,
12 the draft language, and we've been sending
13 that out to our council members to provide
14 feedback.

15 And it's actually been -- I would say
16 that this is a new way engaging because you
17 have a community partner and an agency coming
18 together to share kind of where the process
19 is at and places to engage in that process.

20 I will say that there are some
21 agencies that haven't gotten a chance to do
22 engagement over the administrative rule
23 beyond just posting notice. Right? And
24 there is a culture of this is just what we've
25 done. Right? There isn't an engagement

1 process or this is just what we do. Right?
2 We don't do this. What we do is we post it
3 and those who are interested, they engage in
4 that process.

5 So, I also want to acknowledge that we
6 have agencies in that continuum who are just
7 starting out, who have never done this. And
8 we have some, like the example that I gave
9 who does have some experience with sharing
10 and doing that co-creation around what the
11 process looks like, how to set up the process
12 so that there is multiple opportunities to
13 provide feedback beyond the kind of
14 traditional sign up for this portal and
15 submit your comment through there, you know.
16 So, we've been really looking at various ways
17 to engage in that process.

18 MODERATOR: That's great. Dionne, did
19 you have anything to add?

20 MS. WILLIAMS: No. I mean, at the
21 state level, we do have a rulemaking process
22 that includes public comment that does
23 include, you know, a regulated process for
24 written comments and public hearing on
25 rulemaking that's similar to what Neal was

1 describing. I mean, at the local level, it
2 really depends. I mean, every local entity
3 in the State of Colorado, at least, it's all
4 over the board depending on which local
5 government you're talking about. The City of
6 Denver has a pretty well-established
7 rulemaking process.

8 And so, it kind of depends on the
9 local entity, though, I do see a couple of
10 the questions in the chat talking about sort
11 of who is participating in those processes.

12 And I do think there's probably a lot
13 of work to be done around, you know, just
14 thinking about who is actually representing
15 local communities and representing particular
16 populations and participating in some of
17 those hearings and rulemaking and kind of
18 thinking through that.

19 And that's an area where I think
20 probably every state -- and we're speaking at
21 the state level, can look at sort of their
22 process and thinking about that outreach and
23 understanding how their rules around
24 rulemaking maybe could be looked at with a
25 different lens if we're talking about

1 engagement in underserved populations and how
2 they're participating. But it's pretty
3 similar to what Neal was talking about.

4 MODERATOR: All right. Thank you.

5 So, my next question is what are the biggest
6 problems that you see with respect to
7 engagement of underserved communities and
8 regulatory policymaking?

9 I mean, you know, from my perspective,
10 it seems like folks who are, you know,
11 working all day, one maybe two more jobs,
12 maybe have childcare responsibilities on top
13 of it, are not necessarily using their, you
14 know, half-hour free time a day to read the
15 Federal Register. And so, what are the
16 biggest problems that you're seeing?

17 Jonathan, I don't know if you have
18 thoughts on that.

19 MR. COLLINS: Sure. I think, you
20 know, just kind of from own work, you need
21 some sort of intermediary introduction into
22 engaging with government agencies. And so,
23 you know, the first attempt in -- and I think
24 it's best when that intermediary attempt is
25 something centered around collective

1 engagement as opposed to something that's
2 more so individual.

3 And so, it can't be the first time
4 that we have an encounter is when a person
5 either sort of filing a complaint or when
6 it's sort of subject to some sort of
7 violation. It has to, what I'm finding, is
8 that people are really responsive to these
9 more collaborative, collective processes
10 where they can -- because the thing about
11 engaging communities is that, it's just that.
12 You're engaging communities and it works much
13 better when you're engaging folks, you know,
14 as members of communities.

15 And you know, you want to think about
16 the folks on the agency side as people that
17 are not just ensuring that a public service
18 or a public good is delivered. You want to
19 think about them as people that can help
20 facilitate the overall sort of growth of
21 civil society, of strengthening the sort of
22 social and civic fabric of these communities.

23 And so, I think, again, having these
24 processes be set up in ways where they can be
25 collaborative, community-based, and really

1 iterative where processes lead to more
2 attempts to be engaged in more processes.
3 MODERATOR: Lisa, I don't know if you
4 have anything to add to that from your
5 experience with the School Boards
6 Association. Do you see, and you talk a
7 little bit about just getting the information
8 as part of the problem? Do you see that as
9 the biggest problem with respect to engaging
10 underserved communities?

11 MS. SORONEN: Well, I'm trying to
12 think about how to answer this question.
13 Like, sort of intelligently and coherently.
14 And it's, like, a thought is sort of
15 generating in my brain but I'm not sure I can
16 quite get it out.

17 And one of the commentators asked about
18 the legitimacy of national organizations.
19 So, let me start there. The reality is that
20 for most rulemaking that's going to happen at
21 the federal level, as far as I could tell,
22 and the people who are listening would know
23 better than I.

24 You know, the bulk of the comments
25 that are probably going to be substantive are

1 going to come from national organizations

2 because for the reasons that that's said.

3 Like, individuals don't have time, interest,

4 knowledge, whatever to sort of comment.

5 And I -- one of the challenges that

6 has got to be case when this comes up is that

7 I just about, like, when I was at the

8 National School Boards Association commenting

9 on behalf of school districts. Like I said,

10 in my own mind, my voice was always kind of

11 the underserved. And that underserved in my

12 world was the small and rural because that's

13 where I was coming from. Where I came from

14 professionally. That's what I didn't hear in

15 the regulations.

16 But the point is, like, there was a

17 regulation designed towards or designed

18 towards employers and I was able to respond

19 as a school person, as an employer person.

20 It may be that in every single

21 regulatory context, you want to hear from

22 underserved communities but it may not be

23 that there's an underserved community that's

24 designed to comment to regulations for

25 schools. Or it may be that underserved

1 communities, like, are in schools but I
2 was -- like, the more traditional underserved
3 that you're talking about here -- people of
4 color, people of low-income. I wasn't
5 talking about that perspective. When I was
6 talking about the school perspective. And I
7 couldn't talk about every perspective.

8 So, I'm trying to say something that
9 it's just difficult for me to articulate.

10 And what I think I'm trying to say is that
11 the question for you all who are receiving
12 comments from people and want to hear from
13 particular communities is you have to ask is
14 there a community organized enough to give
15 you comments.

16 And or it might be organized in five
17 or ten other organizations that don't focus
18 just on race or just on poverty or whatever.
19 And so, you may not be able to get the voice
20 that you want because it's not organized
21 properly.

22 And even if it is, like, there's a
23 great voice organized on schools and racial
24 issues. I mean, there is but, like, are they
25 focusing on federal comments. You know, are

1 they doing a million other things? You know,
2 so, I think, like, that's a dilemma. I hope
3 that was comprehensible to someone other than
4 me.

5 MODERATOR: Yeah. I understood it.

6 So, thank you. Thank you for that.

7 So now, I'll open it up to some of the
8 questions in the comments. And the first is
9 what, Lisa, I think, was responding to. So,
10 the question is responding to Lisa's point
11 about rules presuming compliance by large
12 entities, a simplistic cost benefit analysis
13 would suggest that regulators get more ROI
14 from a small number of entities that impact a
15 large number of people. If regulators are
16 influenced by that analysis, what would you
17 say to encourage a different point of view?
18 Lisa?

19 MS. SORONEN: So, I mean, I don't want
20 to nit-pick the question or purposely try to
21 misunderstand it. But I think, like, again,
22 at the end of the day, regulations are driven
23 by law. So, who is regulated is who is sort
24 of legally required to be regulated?

25 So, the agency doesn't necessarily

1 have a choice to say, like, oh, I really want
2 big people to comply or I really want small
3 people to comply. Like, anyone who is
4 regulated has to comply.

5 Now, that said, I think there are some
6 instances where they'll be some exceptions
7 for small entities or things like that. But
8 I think that the question comes from a
9 perspective that's a little bit inaccurate.
10 And what reality is is that the agency
11 doesn't get to choose usually who it
12 regulates. It regulates to the law says it
13 has to regulate.

14 MODERATOR: That's helpful. Does
15 anyone else want to (inaudible).

16 MS. ROMAN: Yeah. I would just
17 encourage a both/and thinking that you may
18 find yourself in an instance where you are
19 engaging a wide mass of people, but you also
20 may want to have feedback at a more local,
21 like, who directly is impacted or who helps
22 navigate people who are directly impacted. I
23 think that way you can kind of get, you know,
24 a wide range of perspectives.

25 We recently have -- are implementing a

1 bill to fully expand health care coverage to
2 all adults regardless of immigration status
3 in Oregon. And we found a lot of value in
4 talking to hospitals and the health systems
5 who are, like, to your question, more of that
6 broader kind of framework.

7 But it's also important to talk to as
8 well, the people on the ground that are
9 encouraging people to sign up and people who
10 actually would sign up and have doubts about
11 that. That way you kind of get a holistic
12 kind of viewpoint of how to approach the
13 issue and just also where you might not see
14 some apparent gaps.

15 You know, that's where we found out
16 that there -- it's really important to have
17 partnerships at a clinical level where they
18 do reach the masses and also critical to have
19 really strong community validators to talk
20 about the new program that would be
21 established through the rule.

22 So, I think both the both/and
23 thinking, it is really beneficial to help
24 really gather a wide range of perspective and
25 feedback of how folks will be impacted.

1 MODERATOR: Great. Well, the next
2 question from our audience is regarding
3 legitimacy of the process. It says because
4 the complexity of rulemaking, regulators rely
5 on associations and intermediaries to speak
6 on behalf of large swaths of people. Do we
7 have significant evidence that these
8 intermediaries have legitimacy themselves as
9 nonelected representatives of various
10 populations?

11 What can agencies, associations, or
12 third parties do to validate that group
13 voices indeed reflect a diverse set of
14 perspectives? So, whereas, the organizations
15 may not have polled its members maybe before
16 submitting comments, I think is what the
17 question is going to.

18 Do any of you have thoughts on that?
19 (Inaudible) Lisa?

20 MS. SORONEN: So, I wonder what, if
21 Dr. Woods has anything from a research
22 perspective. As someone who, like, did this
23 for a national organization, I mean, that was
24 a dilemma.

25 Like, here I was, you know, 28-years

1 old, three years out law school, and I was
2 commenting on all these regulations. And I
3 knew what I knew. I didn't know what I
4 didn't know. And I did the best I could. I
5 mean, in my mind.

6 But absolutely, there were instances
7 when I polled the membership when I tried to
8 find out a variety of solutions. But
9 sometimes I was kind of flying blind and just
10 kind of using what seemed to be, like, common
11 sense.

12 But, you know, you're always limited
13 by the resources of that national
14 organization. And you're limited by the
15 human being that does the job.

16 And I can't say I ever put my name on
17 something that I wasn't sure of or wasn't
18 confident in or that I thought was really
19 guesswork. On the other hand, you know, it
20 was humbling process. And what I knew and
21 what I was able to find out was limited.

22 And so, I can't answer the question of
23 legitimacy. Because that would involve me
24 knowing how people perceived what I was
25 doing, which I don't have an answer to. But

1 what I can answer is it was challenging. I
2 didn't have everything that I needed to know
3 and I did try. I thought about legitimacy
4 not in that word maybe. But I knew my work
5 had to have credibility. I knew it had to be
6 real, and I tried to do everything that I
7 could. But I was limited in what I could do.

8 MODERATOR: Neal or Jonathan, is this
9 something that you've looked at? Whether the
10 organizations that are submitting input are
11 actually submitting representative comments
12 or do any work to make sure that they are?

13 MR. WOODS: I'll jump in first. No.
14 I haven't actually looked at that. And I'm
15 not aware of anyone who has. Maybe Jonathan
16 knows something as he looks at a different
17 set of literature than I do.

18 But at least the kinds of work that
19 I'm looking at -- the stuff that I referenced
20 is relatively recent experimental work. It's
21 maybe in the last five years this has come
22 out in a variety of different settings. In
23 the U.S. setting, in other countries usually
24 at the national level.

25 And usually, the way that people ask

1 about participation is just these very broad
2 statements, you know. That their -- this
3 rule was made without consultation or
4 something like that versus this rule was made
5 with broad consultation with lots of
6 different affected groups versus this rule
7 was made by a consultation process that
8 primarily involved the regulated industry,
9 for instance.

10 And so, these kinds of dynamics about
11 whether end groups are representing their
12 members, at best, that's probably the next
13 step down the road for some of this research,
14 but I haven't seen it addressed.

15 MODERATOR: Lisa, did you want to jump
16 in again?

17 MS. SORONEN: I don't want to dominate
18 the conversation. But this is, like, sort of
19 where I spent a lot of time. I just thought
20 about this as we were talking. In the job I
21 have now, I actually did file comments once
22 and it was on a very typical subject matter.

23 And what I did is I hunted down a
24 national association that hired the unique
25 employees that worked on this subject matter.

1 They knew nothing about the regulation, even
2 though it would have affected their employees
3 directly.

4 What I did was I did this with another
5 individual. I wrote, like, a sketch of,
6 like, the legal stuff and the big picture
7 stuff and then I would say to them, like,
8 sometimes I would try to write the technical
9 points myself. Is this true? Is this
10 correct? Or I would say, like, you've got to
11 fill in the detail here. What is your
12 experience.

13 And so, I found a technical partner to
14 help me. And this is a partner that, like I
15 said, had no idea this even existed. And it
16 was amazing and it was really good. And I
17 couldn't have done really as good of work
18 without them. But I started out thinking,
19 like, I can do this myself and realized, no,
20 you can't.

21 And I was fortunate that they were,
22 like, okay. We'll do the research. We'll
23 answer your technical questions. We'll say
24 yes. We'll say no. We'll save 20 percent.
25 We'll poll our members.

1 So, I'd like to believe the process is
2 legitimate and that the people in it try to
3 make it as such but I -- and I wonder if the
4 people that read my comments saw, like, hey.
5 Like, what does the National League of Cities
6 know about something really technical related
7 to websites? But when we had these, like,
8 website employees maybe it looked better.

9 MODERATOR: That's great. Well, I
10 know we're coming up on time. So, just final
11 question. In your experience, do you believe
12 underserved communities are more engaged at
13 the state and local level? Or do you find
14 that maybe because news is so much more
15 national now that the engagement is actually
16 not greater at the state and local level.

17 So, I was wondering if the panelists
18 could maybe give their 30-second thoughts on
19 local engagement.

20 MS. WILLIAMS: Well, I could say in my
21 experience, again, I think for underserved
22 communities everything is local. So, I think
23 they're very engaged at the local level, more
24 intensely so. And that's where if you can
25 catch them there and help them become more

1 engaged at the federal level, they stay that
2 way. And so, that's my sense of it.

3 MODERATOR: Jonathan, do you have some
4 thoughts?

5 MR. COLLINS: Sure. I think it
6 depends on the issue. And so, we're seeing
7 this play out in real time. And I see this
8 in a lot of my work on the politics of school
9 boards.

10 And so, like right now, you see school
11 boards lit on fire by Critical Race Theory
12 and feelings about Critical Race Theory.
13 Whereas, those same school boards when
14 discussing issues that are more idiosyncratic
15 to the more sort of every day administrative
16 behavior of the district in the sort of
17 administering of the education. And you see
18 much more sort of agreement and opportunity
19 for collaboration.

20 And so, I think -- and high levels of
21 engagement or varying levels of engagement.
22 So, it's going to depend on the issue, you
23 know, we have to think about what are the
24 issues that are going to just attract, one,
25 resonate with the public at large, attract

1 certain level of participation, and then lead
2 to the kind of changes in policy and outcomes
3 that lead to more and more participation.

4 Good results beget more and more civic
5 participation and that's always going to be
6 at the center. And so, but again, the
7 national versus local, all politics is local.
8 I agree with Dionne. The question is, you
9 know, issue by issue, you're going to see
10 some variation.

11 MODERATOR: And Linda, do you find the
12 same?

13 MS. ROMAN: I would just say that
14 there needs to be more. There absolutely
15 needs to be more and as government entities,
16 we have to, you know, how to explore how to
17 create more access into our services.

18 We are served better when we engage
19 with communities. Our programs are better.
20 They're more accessible. And I would just
21 say this last, almost two years of the
22 pandemic has really illustrated that we need
23 to upgrade. We need to morph and we need to
24 move at the speed of community trust and
25 need. And so, and that is with urgency.

1 And so, it think there's a lot of
2 value in beginning the inquiry and work to
3 engage with communities of color and
4 indigenous and tribal communities.

5 MODERATOR: Great. Well, I see that
6 we're out of time. So, I just want to use
7 these final few moments to say thank you in
8 this week of Thanksgiving. Thank you to
9 ACUS. Thank you to all of our panelists for
10 this terrific event today.

11 And I want to remember to mention that
12 there is one more panel, the sixth and final
13 panel of the forum. It's called Expanding on
14 Efforts to Engage with Underserved
15 Communities. It's next Monday, November 29th
16 at 3:30 Eastern. So, thank you to everybody
17 and have a wonderful Thanksgiving. Take
18 care.

19 (End of Audio Recording.)

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CERTIFICATE

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I, Wendy Sawyer, do hereby certify that I was authorized to and transcribed the foregoing recorded proceedings and that the transcript is a true record, to the best of my ability.

DATED this 13th day of January, 2022.

WENDY SAWYER, CDLT