



Board of Accountancy

WASHINGTON STATE

2022 PEAR Strategic Action Plan

Board of Accountancy (ACB)

Presented by:

The ACB Pro-Equity Anti-Racism (PEAR) Team

Acting Executive Director: Jennifer Sciba

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Contact Information

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PEAR Team Information

Has your Agency/Department/Board/Commission established your complete PEAR Team (Executive Order 22-04 Section 2c)? In progress

The Board of Accountancy's purpose is to promote the dependability of financial and other information used by providers of capital when assessing the status and performance of those seeking financial resources.

To accomplish our purpose, the agency is responsible for ensuring that credentialed persons are:

- Initially qualified
- Remain qualified
- Perform competently and
- Held publicly accountable for the quality of their professional services

With this purpose in mind the PEAR team determined that our impacted communities consist of CPAs, potential CPAs, and the public they serve. Within these communities the impacted groups include:

- Senior citizens
- Individuals with English as a second language
- People with disabilities

Other groups impacted by one of our key business lines include:

- Job applicants
- Potential employees

The impacted groups listed are not all inclusive. The groups are limited to the ones specifically addressed in our PEAR service line investments for this Strategic Action Plan.

We requested PEAR team participation by CPAs, potential CPAs, and the public through our website. Additionally, we included a request for participation to CPAs through our semi-annual newsletter. We received several responses requesting additional information. Unfortunately, we did not receive any follow up from those individuals.

We also reached out directly to professional accounting associations with limited interest.

PEAR Team Members:

Agency Executive Leaders:

- Jennifer Sciba / jennifer.sciba@acb.wa.gov

Agency Equity Officer:

- Jennifer Sciba / jennifer.sciba@acb.wa.gov

Employees:

- Lori Mickelson / lori.mickelson@acb.wa.gov
- Kirsten Donovan / kirsten.donovan@acb.wa.gov
- Isaac Ross / isaac.ross@acb.wa.gov

Board Members:

- Tonia Campbell / tonia.campbell@acb.wa.gov
- Rajib Doogar / rajib.doogar@acb.wa.gov

External Customers:

At this time, we have not had any external customers join our team. However, we are actively seeking input and feedback from these individuals through our website posting, agency partners, and the newsletter.

Agency Partners:

- Alphonso Alexander / aalexander@nasba.org / National Association of State Boards of Accountancy (NASBA)
- Greg Schieferstein / greg.schieferstein@brpels.wa.gov / Board of Registration for Professional Engineers and Land Surveyors (BRPELS)

Experts for Key Business Lines:

- Lori Mickelson / lori.mickelson@acb.wa.gov

- Kirsten Donovan / kirsten.donovan@acb.wa.gov
- Isaac Ross / isaac.ross@acb.wa.gov

Subject matter experts (SME) will participate as needed.

Baseline Equity Impact Review (EIR) Completion

Has your Agency/Department/Board/Commission completed the Baseline Equity Impact Review (EIR) of your agency's key business lines to determine where the needs are greatest? Complete

The PEAR Team completed this work on August 5, 2022. The information contained in the EIR was completed with thorough discussions over many Microsoft Teams meetings. Each PEAR team member attended as many meetings as possible, and their contributions were insightful, valuable, and thought provoking.

While our EIR was completed with as much detail and accuracy as possible, we determined that some modifications were needed while completing our PEAR Strategic Action Plan. Accordingly, our EIR will not match up exactly with our PEAR Strategic Action Plan.

Our EIR is available for review if requested.

PEAR Readiness Checklist

Has your Agency/Department/Board/Commission completed all PEAR Readiness Steps below?

- Agency leader and all PEAR Team members attend a PEAR Team Orientation Session hosted by the Office of Equity or watch the recordings. Complete
- Agency leader and PEAR Team members meet to debrief the PEAR Team Orientation Session and discuss next steps. Complete
- Create an agency Pro-Equity Anti-Racism (PEAR) Statement signed by the agency leader outlining the agency's commitment to implementing Executive Order 22-04 and expectations for employees. In progress – expected completion date is October 1, 2022
- Create a video of the agency leader and PEAR Team sharing information about the agency's PEAR Statement. In progress -- expected completion date is October 31, 2022
- Establish a stand-alone agency administrative policy that outlines the agency's roles and responsibilities for implementing Executive Order 22-04. In progress -- expected completion date is October 1, 2022

PEAR Service Line Investments

PEAR Service Line Investment 1

Agency Key Business Line(s): Human Resources

PEAR Service Line where the needs are greatest: Workforce Equity

PEAR Service Line Priority where the needs are greatest: Build a Culture of Pro-Equity, Access, Racial Justice, and Belonging

Job applicants and potential employees – Our goal is to create a recruitment process that:

- Provides for a diverse and inclusive applicant pool
- Eliminates unconscious and conscious bias in the interview process

PEAR Service Line Investment 1 Description - Summarize the policies, processes, practices, and procedures related to this investment: Equity Impact Reviews (EIRs) on Recruitment Processes

As a small agency, we rely on Washington State Department of Enterprise Services Small Agency Human Resources (Small Agency HR) for our recruitment process. Small Agency HR helps us prepare our job listing descriptions, posts our job listings on careers.wa.gov, screens the received applications, and forwards the applications which meet the requirements.

What disparities do you seek to decrease or eliminate with this investment?

Our investment seeks to reduce or eliminate the exclusion of applications from impacted groups and reduce unconscious/conscious bias in the interviewing process.

The 2017-2021 data provided by the State Small Agency Human Resources recruitment team indicates that white/Caucasian applicants account for the majority of applications submitted for our job postings.

The Board of Accountancy is a small agency with only 11 allocated full-time employee positions. Currently, our 8 employees consist of the following demographics: 3 white males, 4 white females, and 1 Asian female.

Which people groups and/or places, with the greatest need, does this investment focus on?

This investment will focus on job applicants and potential employees.

While we have limited staff turnover, when new positions become available in the future, we are committed to having a diverse applicant pool from which to find the best candidate. A diversity and equity lens will be used when considering qualified candidates.

Did your agency consult with tribal governments and Recognized American Indian Organizations (RAIOs)? How does this investment address the consultation they provided? Indicate N/A if not applicable.

Unfortunately, no not prior to completing this report. However, we recently received a list of Washington tribes, some of which have contacts for the Finance/CFO leaders. Our goal is to reach out to tribal governments and recognized American Indian Organizations (RAIOs) moving forward.

What did impacted communities/employees/other interested parties identify as the root causes of the disparities? How will your investment address the root causes?

Based on PEAR team conversations and consultations to date, the identified root causes of disparities are systemic exclusionary processes and unconscious and/or conscious biases embedded in the states hiring practices that may adversely affect impacted communities.

To address root causes for this investment we will be more proactive in the recruitment process including but not limited to the following:

- Reviewing and updating the hiring practices with the State Small Agency Human Resources recruitment team
- Increasing distribution of job announcements – not only through career.wa.gov
- Reviewing and updating position description/job requirements with an inclusive lens
- Reviewing and updating internal interview procedures
- Reviewing and updating questions used during interview process
- Requiring individuals sitting on interview panels and making hiring decisions to take additional training regarding biases and diversity, equity, and inclusion

How does your investment address concerns and priorities identified by impacted communities/employees/other interested parties?

Our investment is expected to ensure that the hiring process is more equitable and available to everyone. Diversity in staff and leadership is expected to be attractive for potential applicants when considering accepting a position with us.

How will/could your investment increase or decrease benefits for communities/employees/other interested parties? Increase or decrease burdens? How will your agency identify and minimize any unintended harms?

The benefit of our investment is expected to be a more diverse and inclusive applicant pool which could result in a more diverse staff. Updating the position descriptions and job postings can be expected to open job opportunities for impacted groups.

Potential burdens could include increased staff time devoted to reviewing more applications and conducting more interviews, and potentially increased agency costs for training and job postings.

Feedback from the Small Agency HR recruitment team, staff who conducts interviews, and potential applicants will notify us of unintended harm by the investments we implemented. If notified or discovered, we will review the issue and act accordingly.

PEAR Determinants of Equity supported by this investment:

- Equity in State & Local Practices
- Equity In Jobs & Job Training

PEAR Determinants of Equity Group(s) [Community Support Systems (Trunk), Family Support Systems (Branches), Community Infrastructure (Root System), Government Practices (Soil & Nutrients)] supported by this investment:

- Equity in Government Policies, Practices, People and Systems (Soil & Nutrients)
- Equity in Community Infrastructure (Root System)

Desired PEAR Outcome(s):

Our desired PEAR outcome is to have a highly diverse workforce. Additionally, we want to offer employment opportunities to individuals who have been under-represented or excluded.

PEAR Habit(s) needed to achieve desired PEAR Outcomes:

- Relatable Workforce – Create a more diverse workforce (measured by attributes, such as but not limited to, race, ethnicity, gender, sexual orientation, and disability status) to be more responsive to the needs of our employees and the communities we regulate and serve, including CPAs, potential CPAs, and the public.
- Continuous Workforce Development – Provide biases and diversity, equity, and inclusion training to current employees who participate in the interview and selection process.

PEAR Service Line Investment Lead or Team - Who is responsible for leading the actions?

Lori Mickelson

Collaboration needs - Who does the agency need to collaborate with to make the investment?

To be successful we will need to collaborate with Small Agency HR, agency managers, supervisors, and employees.

What are the potential barriers, challenges, and/or risks of this investment?

The potential barriers, challenges, and/or risks include:

- Business Resource Groups (BRG) will not be notified of lower-level positions according to Small Agency HR
- Time restraints for posting to outside sources
- Low turnover of current employees creates less opportunity to hire a more diverse workforce

Solution(s) identified to address resource needs and barriers/challenges/risks:

Potential solutions will include:

- Keeping an open mind on where we can advertise new job posting
- Planning for agency needs
- Be prepared, educated, and ready to act. Our window of opportunity is limited, so when we can hire a new employee, we will ensure we are following our PEAR Strategic Action Plan

PEAR Service Line Investment Start Date: 9/1/2022

PEAR Service Line Investment Target End Date: 9/1/2023 (ongoing for several recruitments)

PEAR Performance Measure(s) - What measures will be used to determine effectiveness of investments? Were these measures informed by impacted communities/employees/interested parties? Choose a minimum of 1 outcome measure and 1 process measure for each investment.

Small Agency HR, employees, and Board Members determined these measures.

Outcome Measure:

Increase in the number of applicants from impacted communities responding to job postings.

Process Measures:

The number of individuals who participate in the hiring process completing the additional training regarding biases and diversity, equity, and inclusion.

The number of changes made reflecting a PEAR lens to hiring practices, position description/job requirements, internal interview procedures, and questions used during the interview process.

The number of job listings posted to sources outside of careers.wa.gov

PEAR Goals - What exactly will your agency achieve in the first 3 months after investment start date? Were these goals informed by impacted communities/employees/interested parties? Choose 1 goal for each outcome and process measure.

Outcome Measure 1 Quarter 1 Goal:

We are committed to having a diverse applicant pool from which to find the best candidates. Due to limited staff turnover, we cannot determine if we will have an open recruitment to measure this goal in the first quarter.

Process Measure 1 Quarter 1 Goal:

25% of staff who participated in the hiring process will complete training regarding biases and diversity, equity, and inclusion.

Staff will review one section of the second process measure noted above. We will update the internal interview procedure and note the number of changes made.

Until we have an open recruitment, we will not be able to measure this goal.

What data sources will your agency use to measure success? Consider data sources created by impacted communities/employees/other interested parties if available.

Small Agency HR will provide demographic information about job applicants. Board staff will provide internal measure data regarding completed trainings and the number of changes made to

hiring practices, position description/job requirements, internal interview procedures, and questions used during the interview process.

Describe the plan to partner, share, listen, adjust, and learn with impacted communities/employees/other interested parties during investment implementation:

Our plan is to work with Small Agency HR to find ways to obtain feedback from the job applicants and potential applicants.

Describe the plan to partner, share, listen, adjust, and learn with impacted communities/employees/other interested parties during investment evaluation:

We will analyze and evaluate our investment with input from Small Agency HR to determine if our process measures created a diverse applicant pool. We will adjust as needed.

PEAR Service Line Investment 2

Agency Key Business Line(s): Communications

PEAR Service Line where the needs are greatest: Public Communications and Education

PEAR Service Line Priority where the needs are greatest: Update and Apply Language Standards

Users of our website and written and visual communications – Our goal is to improve communication access and inclusive and equitable representation for:

- Individuals with English as a second language (ESL)
- Populations with enhanced visual and auditory needs
- Impacted communities

PEAR Service Line Investment 2 Description - Summarize the policies, processes, practices, and procedures related to this investment: Digital Equity Conditions

As a small agency, we rely on Department of Enterprise Services, WaTech for our website design and platform. Content updates are done internally by our Data and Systems Administrator. Our online licensing system is operated on the Salesforce platform. We provide the content.

What disparities do you seek to decrease or eliminate with this investment?

Our investment seeks to improve auditory, visual, and linguistic accessibility on our website, in our licensing system, and within our written and visual communications, while ensuring an inclusive and equitable representation for all.

Which people groups and/or places, with the greatest need, does this investment focus on?

Currently, 28% of our CPAs are non-U.S. individuals. Therefore, our initial investment will focus on improving accessibility for ESL populations, as well as populations with enhanced visual and auditory needs, and diverse identities.

Did your agency consult with tribal governments and Recognized American Indian Organizations (RAIOs)? How does this investment address the consultation they provided? Indicate N/A if not applicable.

Unfortunately, no not prior to completing this report. However, we recently received a list of Washington tribes, some of which have contacts for the Finance/CFO leaders. Our goal is to reach out to tribal governments and recognized American Indian Organizations (RAIOs) moving forward.

What did impacted communities/employees/other interested parties identify as the root causes of the disparities? How will your investment address the root causes?

Based on PEAR team conversations and consultations to date, the principle causes of disparity are potential accessibility issues with the website and under-representation of impacted communities identified above.

To address root causes for this investment, we will update our communications by:

- Adding additional language options
- Reviewing website for accessibility through WaTech and update as needed
- Providing for the use of translation services
- Providing visual and auditory tools
- Ensuring graphics and photos are representative of diverse groups
- Adding diversity, equity, and inclusion information in our communications

How does your investment address concerns and priorities identified by impacted communities/employees/other interested parties?

Our investment is expected to ensure that our communications are accessible, representative, and inclusive for all.

How will/could your investment increase or decrease benefits for communities/employees/other interested parties? Increase or decrease burdens? How will your agency identify and minimize any unintended harms?

The benefit of our investment is expected to be improved communication with impacted communities making it easier to do business with us. Additionally, our intent is to foster a sense of inclusion and belonging with this investment.

A decreased benefit may be discomfort caused by the use of enhanced language options and characterizations such as gender sensitive terminology to communities who do not share Washington's Pro-Equity Anti-Racism (PEAR) values.

Unintended harm for employees may be responses from individuals, who do not share Washington's PEAR values, regarding diversity, equity, and inclusion information in our communications.

PEAR Determinants of Equity supported by this investment:

- Equity in State & Local Practices
- Equity in Justice Systems & Laws
- Digital Equity

PEAR Determinants of Equity Group(s) [Community Support Systems (Trunk), Family Support Systems (Branches), Community Infrastructure (Root System), Government Practices (Soil & Nutrients)] supported by this investment:

- Equity in Government Policies, Practice, People and Systems (Soil and Nutrients)
- Equity and Community Infrastructure (Root System)

Desired PEAR Outcome(s):

Our desired PEAR outcome is inclusive communications encompassing written, verbal, and visual elements, including but not limited to our website, emails, phone calls, and newsletters.

PEAR Habit(s) needed to achieve desired PEAR Outcomes:

- Community-Centered Tools – Ensure our website has the tools needed and accessibility features that allow all users to obtain the information they are seeking.
- Communication Standards – Use plain talk language in all communications and make translations services available.

PEAR Service Line Investment Lead or Team - Who is responsible for leading the actions?

- Kirsten Donovan
- Isaac Ross

Collaboration needs - Who does the agency need to collaborate with to make the investment?

To be successful we will need to collaborate with WaTech, agency managers, employees, and impacted communities.

What are the potential barriers, challenges, and/or risks of this investment?

The potential barriers, challenges, and/or risks include:

- Locating and identifying a translation service for each communication method
- Feeling comfortable in our responses to feedback from individuals who do not share Washington's PEAR values

Solution(s) identified to address resource needs and barriers/challenges/risks:

Potential solutions will include:

- Reaching out to WaTech to discuss our needs for accessibility and their capabilities of providing this resource for our website
- Reaching out to other agencies who utilize translation services for their recommendations
- Providing resources to staff on how to respond to individuals who do not share Washington's PEAR values

PEAR Service Line Investment Start Date: 9/1/2022

PEAR Service Line Investment Target End Date: 9/1/2023

PEAR Performance Measure(s) - What measures will be used to determine effectiveness of investments? Were these measures informed by impacted communities/employees/interested parties? Choose a minimum of 1 outcome measure and 1 process measure for each investment.

Employees and Board Members determined these measures.

Outcome Measure:

We will analyze the responses from the surveys attached to email correspondence, newsletter, and on the website.

Process Measures:

Increase the number of visual and auditory resources available on our website and increase the number of languages available through online translation services.

Monitor responses to our PEAR and diversity, equity, and inclusion communications.

PEAR Goals - What exactly will your agency achieve in the first 3 months after investment start date? Were these goals informed by impacted communities/employees/interested parties? Choose 1 goal for each outcome and process measure.

Outcome Measure 1 Quarter 1 Goal:

Our goal is to increase the language options available on the website by 100%.

Process Measure 1 Quarter 1 Goal:

Add different language options to the website.

Design and validate a survey to obtain input from impacted communities on the improvements that would provide them the highest value. This process is expected to involve consultations with impacted communities as well as principal communities who the agency serves.

What data sources will your agency use to measure success? Consider data sources created by impacted communities/employees/other interested parties if available.

Information Technology (IT) staff will provide the number of languages available on our website.

Describe the plan to partner, share, listen, adjust, and learn with impacted communities/employees/other interested parties during investment implementation:

Our plan is to obtain feedback from impacted communities and other interested parties through the use of our surveys and adjust as needed.

Describe the plan to partner, share, listen, adjust, and learn with impacted communities/employees/other interested parties during investment evaluation:

We will analyze and evaluate our investment to determine if our process measures have created inclusive communications. We will adjust as needed.

PEAR Service Line Investment 3

Agency Key Business Line(s): Public Protection

PEAR Service Line where the needs are greatest: Leadership, Operations, and Services

PEAR Service Line Priority where the needs are greatest: Relational Partnerships

Users of CPAs and accounting services, including senior, lower-income, English as a second language (ESL), and small business communities – Our goal is to educate and provide resources that:

- Provide outreach to communities to share information regarding the difference between CPAs and accountants
- Provide information through email, phone calls, and our website for alternate resources when we are unable to help
- Promote education and provide resources by encouraging CPAs to participate in community investment through investing time in community centers and providing educational workshops

PEAR Service Line Investment 3 Description - Summarize the policies, processes, practices, and procedures related to this investment: Equity Impact Reviews (EIRs) on public protection

Public protection is an important part of our mission; as such, one powerful tool is to educate members of the community and provide resources to make informed decisions.

In the past, we have held outreach events to share the purpose and scope of the Board, and CPAs in the community. When we held events for CPA firms or organizations, the response was positive. However, the attendance at the events held for the public was minimal.

Currently, our website has information regarding consumer protection, the Board's authority over CPAs and non-CPAs, and additional resources.

What disparities do you seek to decrease or eliminate with this investment?

Our investment seeks to reduce or eliminate the confusion among impacted communities including senior, lower-income, ESL, and small business communities on which agencies, organizations, or authorities have jurisdiction and can provide assistance.

Which people groups and/or places, with the greatest need, does this investment focus on?

This investment will focus on impacted communities including senior, lower-income, ESL, and small business communities.

Did your agency consult with tribal governments and Recognized American Indian Organizations (RAIOs)? How does this investment address the consultation they provided? Indicate N/A if not applicable.

Unfortunately, no not prior to completing this report. However, we recently received a list of Washington tribes, some of which have contacts for the Finance/CFO leaders. Our goal is to reach out to tribal governments and recognized American Indian Organizations (RAIOs) moving forward.

What did impacted communities/employees/other interested parties identify as the root causes of the disparities? How will your investment address the root causes?

Based on PEAR team conversations and consultations to date, the identified root causes of disparities are a lack of suitably tailored information, education, and resources for impacted communities.

To address root causes for this investment, we will actively promote public protection education which includes but is not limited to:

- Partnering with other organizations to extend our outreach to provide education and resources regarding the Board’s role and purpose
- Promoting the use of the licensee search tool regarding license status and disciplinary actions
- Responding to emails and phone calls with alternate resources when we are unable to assist
- Encouraging CPAs to invest their time in community education and volunteer work

How does your investment address concerns and priorities identified by impacted communities/employees/other interested parties?

Our investment is expected to expand our outreach and better protect the public through education and resources.

How will/could your investment increase or decrease benefits for communities/employees/other interested parties? Increase or decrease burdens? How will your agency identify and minimize any unintended harms?

The benefit of our investment is expected to enhance and expand outreach to communities not currently well-informed about the Board’s role and responsibilities.

Potential burdens could include difficulties in identifying and communicating with our impacted communities.

We will identify unintended harms primarily through feedback from impacted communities, partner organizations, or internal observation. We will then review the issues identified and make adjustments as needed.

PEAR Determinants of Equity supported by this investment:

- Equity in State and Local Practices
- Community and Public Safety

PEAR Determinants of Equity Group(s) [Community Support Systems (Trunk), Family Support Systems (Branches), Community Infrastructure (Root System), Government Practices (Soil & Nutrients)] supported by this investment:

- Equity in Government Policies, Practices, People and Systems (Soil & Nutrients)
- Equity and Family Support Systems (Branches)

Desired PEAR Outcome(s):

Our desired PEAR outcome is improved outreach activities to address the root causes of disparities as detailed above, providing education and resources that result in a better protected, more informed, and well equipped public when dealing with the accounting profession.

PEAR Habit(s) needed to achieve desired PEAR Outcomes:

- Equity Impact Reviews (EIRs) – Using the PEAR determinants of equity to provide education, outreach, and resources to impacted communities.
- Trust – Engage with impacted communities to build safe and lasting relationships

PEAR Service Line Investment Lead or Team - Who is responsible for leading the actions?

- Kirsten Donovan
- Isaac Ross
- Lori Mickelson

Subject matter experts (SME) will participate as needed.

Collaboration needs - Who does the agency need to collaborate with to make the investment?

To be successful we will need to collaborate with CPAs, impacted communities, the Washington Society of CPAs (WSCPA), the National Association of State Boards of Accountancy (NASBA), the Washington Association of Accountants and Tax Professionals (WAATP), community centers that support seniors and impacted communities, and any other organization that we can identify.

What are the potential barriers, challenges, and/or risks of this investment?

The potential barriers, challenges, and/or risks include:

- Identifying and communicating with impacted communities
- Finding the best methods for effectively communicating with impacted communities
- Finding CPAs willing to donate their time and services to volunteer for community investment
- Expanding disclosures and information disseminated in our outreach efforts may result in unintended consequences.

Solution(s) identified to address resource needs and barriers/challenges/risks:

Potential solutions will include:

- Partner with the WSCPA, agencies, and other associations for help in identifying impacted groups, as well as CPAs and other professionals willing to volunteer
- Input from Board Members

PEAR Service Line Investment Start Date: 9/1/2022

PEAR Service Line Investment Target End Date: 9/1/2023

PEAR Performance Measure(s) - What measures will be used to determine effectiveness of investments? Were these measures informed by impacted communities/employees/interested parties? Choose a minimum of 1 outcome measure and 1 process measure for each investment.

Employees and Board Members determine these measures.

Outcome Measure:

An increase in the amount of education and resource opportunities made available to impacted communities through volunteer efforts.

Process Measures:

The total volunteer hours invested in community education and volunteer work related to accounting.

PEAR Goals - What exactly will your agency achieve in the first 3 months after investment start date? Were these goals informed by impacted communities/employees/interested parties? Choose 1 goal for each outcome and process measure.

Outcome Measure 1 Quarter 1 Goal:

Gather a baseline of those who are volunteering their services to impacted communities.

Process Measure 1 Quarter 1 Goal:

Notify all licensees of our PEAR outreach efforts through multiple means of communication and request information on their volunteer activities.

What data sources will your agency use to measure success? Consider data sources created by impacted communities/employees/other interested parties if available.

Our plan is to utilize internal measure data, survey responses, number of mailings, and outreach events.

Describe the plan to partner, share, listen, adjust, and learn with impacted communities/employees/other interested parties during investment implementation:

Our plan is to gather feedback from surveys and other outreach efforts.

Describe the plan to partner, share, listen, adjust, and learn with impacted communities/employees/other interested parties during investment evaluation:

We will analyze and evaluate our investment with input from impacted communities to determine if our process measures created a better protected, more informed, and well-equipped public. We will adjust as needed.