

AGENCY EQUITY ACTION PLAN: Northern Border Regional Commission
January 20, 2022

(1) Executive summary

- Agency name and mission
- Summary of Action Plan

Agency Name & Mission

The Northern Border Regional Commission (NBRC) is currently operating under the following Mission:

Mission

The mission of the Northern Border Regional Commission is to catalyze regional, collaborative, and transformative community economic development approaches that alleviate economic distress and position the region for economic growth.

NBRC Region

The NBRC serves counties across four states: Maine, New Hampshire, New York, and Vermont. The number of counties was expanded considerably by Congress in 2018, and now includes 12 counties in Maine, 6 counties in New Hampshire, 28 counties in New York, and 14 counties in Vermont.

While each state offers its own unique characteristics, the counties served by the NBRC have the common linkage of having experienced economic disruptions due to the changing nature of the forest products industry over the past several decades. The region is colloquially called the “Northern Forest” in homage to the importance of this industry in the development of the region throughout its history.

NBRC continues to grow and expand its program options. At present, we serve communities primarily through our flagship program, the State Economic and Infrastructure Development program, while our smaller programs include the Regional Forest Economy Partnership and State Capacity Grants.

Summary of Action Plan

Our action plan, detailed below, proceeds along three initiatives. Initiatives I-II proceed in logical order, while Initiative III is a parallel process that is ongoing.

Initiative I is essentially a primary and secondary data collection process that will allow us to learn more about what barriers exist to accessing our funding among the under-served communities in our region. Upon identification of these barriers, Initiative II follows on by determining specific actions to address those barriers.

Initiative III expounds on our continuing efforts to engage with Tribal Consultation, consistent with E.O. 13175.

(2) Summary of early accomplishments

- Please highlight any equity-related achievements or successes (e.g., innovative stakeholder engagement, notable changes in policies or operations, new partnerships, etc.) since EO 13985 was released on January 20, 2021.

1. Focus Area #1: Core Grant Investment Review

In 2021, the NBRC engaged with an external data analyst to determine areas of “Persistent Poverty” within our region. The purpose of this analysis was to complement existing¹ (and required by Statute) calculations of economic “distress” within the region, and so provide insight into areas of under-investment.

The results of this analysis showed that there were no areas that fit the designation of Persistent Poverty in our region. As such, the search will continue for additional measures and data, which we will approach via two pathways; please see **Equity action plan** section below for additional details.

2. Focus Area #2: Tribal Consultation

After a difficult start, we have begun to gain traction with our Tribal Consultation plan. As we noted in previous submissions, we decided to approach existing stakeholders in our region in hopes that they might offer a different pathway to connecting with Tribal communities. This strategy was successful; through a partnership with the U.S. EPA’s “Recreation Economy for Rural Communities” (RERC) program, we were able to meet with the St. Regis Mohawk Tribe in New York earlier this fall. Through our new connections there, we have received additional contacts that we hope will allow us to connect meaningfully with other Tribes in our region. This work is ongoing, but we have a staff member assigned to work on it, and we are hopeful that the momentum will continue.

(3) Equity action plan

Please clearly identify **three to five** actions that your agency plans to undertake and list them **in order of priority**; provide evidence-based reasoning for selection; and outline high-level elements of implementation. (Actions should address the institutional resources available to offices responsible for advancing **civil rights** pursuant to Section 5(d) and **procurement and contracting** pursuant to Section 7(a) of EO 13985, but may also focus on other significant

¹ Per 40 U.S.C., Subtitle V, the NBRC is directed to annually calculate rates of poverty, unemployment, and outmigration in each county served, and to categorize each county based on its level of “distress.” The result is a classification system such that each county is “Distressed,” “Transitional,” or “Attainment.” Applicants in “Distressed Counties” must only provide 20% of their requested grant award in matching funds. Applicants in “Transitional” counties must provide 50%, and applicants in “Attainment” counties are not eligible for grants, though specific communities within those counties may be classified as “Isolated areas of distress,” and are thus eligible for NBRC grants.

priorities identified by the agency regardless of whether they were included in the agency's equity assessment.)

For **each action**, please include:

A. Barrier to Equitable Outcome(s)

- *Describe the barrier you are trying to address.*
- *Specify the program, policy, or regulation that contributes to this barrier.*
- *Indicate which populations are most impacted by this barrier.*
- *List the evidence indicating that this barrier meaningfully impacts full and equal participation.*

B. Action and Intended Impact on Barrier

- *Describe the actions the agency will take to eliminate/reduce the barrier.*
- *Why did you prioritize these actions?*
- *Indicate how the actions are expected to result in reducing or eliminating the barrier to equitable outcomes. If not identified above, please indicate what evidence supports this connection.*

C. Tracking Progress

- *Describe what factors you will use to determine whether the agency action(s) has eliminated or substantially reduced the barrier to equitable access identified above in the near- to mid-term (2-4 years out).*
- *Indicate what success might ultimately look like in the long-term (5-8 years out).*

D. Accountability

- *Describe how the agency will hold itself accountable to implementing this action. Consider potential internal and external mechanisms (e.g., aligning with the Agency Strategic Plan and/or other public-facing documents, embedding equity-related goals in performance plans, holding virtual town halls, etc.) and how and when the agency will communicate progress to stakeholders.*

Prior to writing about the initiatives outlined below, please note that the NBRC consists of only 8 FTEs, and as such, we do not have a separate office of Civil Rights, or in-house Procurement & Contracting functions. Three of our staff, including the Executive Director, serve on our in-house DEIA Committee.

Initiative I: Understanding capacity issues in under-served communities

From our work with stakeholders throughout the region, we are aware that some of our smallest communities may not have the capacity to participate in our grant programs. But, we don't have an in-depth understanding of which communities are most impacted, and specific barriers by town size.

Barrier to Equitable Outcome

The barrier is capacity, primarily with regard to human resources and expertise. We know that very small communities struggle to identify the expertise to conceptualize a potential project, and then, should they be awarded funds, to properly administer the project in accordance with Federal grant guidelines (e.g., 2 CFR 200). As such, we are concerned that there are multiple small rural communities in our region that are under-served by our programs.

Action & Intended Impact

1. Our primary action to address this barrier is to partner with stakeholders in the region to better understand the variables that characterize capacity differences among various small communities. Capacity challenges may vary based on a community's wealth, geographic location / proximity to transportation or other services, etc.
2. Following Action #1, we will then be able to design strategies to assist those communities most in need of capacity assistance. These tactics will be communicated publicly, and initiatives will be included in future budget requests.

We are hiring a *Program Manager* for the State Economic & Infrastructure Development (SEID) program. This individual will provide us with the capacity to manage the above analysis and actions. We are already working on an RFP for a contractor to assist with the data collection needed for #1. After consulting with the other active Commissions, we are also building a job description for a research and evaluation position that will focus on data collection to include potentially underserved communities, such as those described below.

Tracking Progress

The primary indicator of progress will be increased participation (measured by an increase in grant applications) by the communities identified in the analysis.

Accountability

The best way that the NBRC can hold itself accountable is by incorporating this work into our Strategic Plan, which will be revised during CY 2022. We are in the process of creating a RFQ for assistance in building a strategic plan that will integrate this initiative into our core functions. The strategic plan will allow us to assign accountability within individual functions at the NBRC, which flows into the annual goals assigned to each staff member. Progress will be included in our required Annual Report to Congress, which is a public document.

Initiative II: Ongoing Tribal Consultation efforts

Barrier to Equitable Outcome

We have participated fully in Tribal Consultation efforts resulting from EO 13175, and while we have had some success in making meaningful connections through a stakeholder-driven strategy, we have yet to connect with all of the Tribes in our region. The barrier has been – and remains – finding pathways to the correct individuals within the Tribes that are responsible for economic development efforts.

There are 8 Federally-recognized Tribes in the NBRC's region, and 11 State-recognized Tribes. To date we have sought engagement with each of the 8 federally recognized Indian Tribes, and received applications for funding from 1 federally recognized Maine tribe and 1 state recognized Vermont tribe.

Action & Intended Impact

Because our successes have thus far been rooted in meaningful connections via partners and regional stakeholders, we have identified additional stakeholders to whom we can reach out in search of appropriate pathways.

Tracking Progress

Because we know the number of Tribes in our region, and we know which we have contacted, it will be fairly simple to quantitatively track our progress in making connections. Longer-term measures will be the extent to which Tribes apply for our funding; and, longer-term, whether these projects are successful and result in useful economic development outcomes. If the projects aren't successful or don't result in positive economic development outcomes, this may alert us to as-yet unknown barriers that we could identify and address using the framework articulated in this document.

Our goal is to have engaged meaningfully with 75% of the Federal and State-recognized Tribes in our region by the release of our 2023 State Economic & Infrastructure Development grant round (anticipated: March, 2023). Meaningful engagement is defined here as one of our staff or State Program Managers (state employees who promote NBRC grant opportunities in each state) having met with a representative of a Tribe and engaged in a two-way dialogue about the Tribe's needs, and whether NBRC grant programs might be of assistance in meeting those needs.

Accountability

Tribal Consultation is part of our Agency's overarching – and still developing – equity strategy, which touches upon populations, such as Indian Tribes, and also geography, such as under and unserved rural communities in our region. This strategy will be more fully articulated in our 2022 Strategic Plan.