



PARTNERS FOR RURAL TRANSFORMATION

Friday, September 30, 2022

Ms. Denice Ross, U.S. Chief Data Scientist
Attn: NSTC Subcommittee on Equitable Data
Office of Science and Technology Policy
equitabledata@ostp.eop.gov

Notice of request for information (RFI): Advancing Equity with Community Data Partnerships

Partners for Rural Transformation Comments

Dear NSTC Subcommittee on Equitable Data Members;

Guided by a vision of a nation where persistent poverty no longer exists, six regional Community Development Financial Institutions (CDFIs) located in and serving regions with a high prevalence of persistent poverty came together. The CDFIs—Come Dream | Come Build (cdeb) of Brownsville, Communities Unlimited, Fahe, First Nations Oweesta Corporation, HOPE Credit Union and Enterprise Corporation, and Rural Community Assistance Corporation—formed a coalition, currently called the [Partners for Rural Transformation](#) (“The Partners”). With a shared ethos of investing in both people and places and informed by the voices of local people, we seek to unify around opportunities in diverse communities at a time of great division in our nation. A closer look at persistent poverty America reveals how structural exclusion by place and race continues to paint a picture that is steadfastly rural and marred by racial, capital and data inequity. These challenges are exacerbated by a history of disinvestment and data extraction.

Rural America faces systematic, avoidable, and unjust economic, health, and racial disparities. Legacies of forced geographic and cultural displacement, enslavement, financial discrimination, residential segregation, and transitioning economies have left an indelible mark. Despite evidence of persisting rural inequities, there is no coordinated effort to build a comprehensive evidence base to support deep systems change – that is, to generate research that informs the shifts in policies, practices, resources, power, trust, and attitudes necessary to advance equity. Therefore, Partners for Rural Transformation suggest the following steps to achieve data equity:

- **Expand Evidence-Based, Policy-Relevant Rural Research:** Highlighting rural assets through research and data to shift attention from deficit-based narratives to policy-relevant, solutions-focused outcomes; Federal agencies such as HUD and the U.S. Department of Agriculture could support development and maintenance of new Housing Assistance Council (HAC) tool, Rural Data Central, which helps local community-based organizations and municipalities better strategize, plan, and administer federal resources and programs through combining data from numerous federal agencies that will provide information on social, economic and housing characteristics of communities in the United States;
- **Equity Focused Impact Measurement:** Capturing the degree of success of new federal and state programs with race and place in mind, and transparent dissemination of results;
- **Increase Data Accessibility:** Holding educational sessions (webinars, in-person trainings) on datasets available and how to leverage them; adding a “Reliability Index,” a classification or typology to Home Mortgage Disclosure Act (HMDA) data that would indicate how much lending activity in a particular market is covered by the



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data. For example, markets such as the colonias in the U.S.-Mexico border region, where many home purchases involve cash-only transactions that are not covered by HMDA, would be classified as having “limited coverage.” Restoring rural codes back to American Housing Survey, conducted by the Census Bureau for the U.S. Department of Housing & Urban Development.

- Developing More Robust Definition(s) of Rural: Leveraging resources by redefining rural America to target rural communities of persistent poverty and communities of color. Consider multiple definitions to ensure equity across race, place and rurality;
- Launch a National Rural Research Network and Agenda: Connecting and amplifying rural researchers by facilitating a national rural research agenda, promoting policy-relevant research, and translating evidence to national audiences; adding metrics to U.S. Department of Labor’s National Agricultural Workers Survey (NAWS) such as: detailed information on housing quality or conditions, and farmworkers on temporary H-2A visas who account for a large portion of the farm workforce. NAWS should be revised to collect this information, and federal agencies should support relevant private efforts
- Strengthen Investment Capacity and Strategy: Supporting asset-based policymaking, investments, and impacts through capacity building and tools to strengthen how decisions are made, outcomes are tracked, and equity is advanced

Rural America is much more than the sum of its deficiencies. These communities possess unique strengths and potential—in human and natural capital, in social and physical infrastructure, in cultural resources. To affect change and increase equity requires evidence-based policymaking that invests in these strengths, centers rural voices, and focuses on solutions and not just problems. The moment is now. With rural issues gaining attention as part of the national equity agenda and historic and bipartisan federal investments in rural communities through the American Rescue Plan Act, Inflation Reduction Act, and the Infrastructure Investment and Jobs Act, many are seeking new data and evidence-based strategies to advance equity and strengthen investments to create thriving and equitable rural futures.

In Partnership,

In partnership,

Jose A. Quinonez, Director
Partners for Rural Transformation (PRT)
jose@pfmt.org
859-756-6256



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