



Policy Development and Evaluation

Why this policy is important

Home Forward is a federally regulated Public Housing Authority (PHA) meaning that we must follow federal laws and rules when implementing our programs. However, we have flexibility in many areas to develop and change policy. The policy choices we make impact the programs that we administer and the people we serve. A consistent, equitable, and inclusive agency wide policy analysis, development, and change process ensures that we are using the best policy option to achieve the outcomes we want, including reducing racial disparities and advancing racial equity.

Who needs to know and understand this policy?

All Home Forward staff who develop or make substantive changes to Home Forward policies.

Who is responsible for implementing this policy?

Director of Policy and Planning and any Home Forward employee doing policy evaluation, development, or change work at Home Forward.

Who has the authority to change this policy?

Executive Director and Director of Policy and Planning



Topic Date Effective/Revised

Definitions.....	5/1/22
Difference between Policy and Procedures.....	5/1/22
Policy Development and Change Process.....	5/1/22

Acknowledgment

The Center on Equity and Inclusion (CEI) was a key consultant and partner in the development of this policy. We appreciate their support and expertise in learning to review and develop policy in an inclusive way that advances racial equity.

Definitions

Public Policy: Public policy can be defined as a system of laws, regulatory measures, courses of action, and funding priorities created by a government or public agency. Public policy has a number of key qualities:

- Policy is made in response to some sort of issue or problem that needs to be addressed.
- Policy is what the government chooses to do (actual) or not do (implied) about a particular issue or problem.
- Policy might take the form of law or regulation that governs a particular issue or problem.
- Policy is made on behalf of the "public."
- Policy is intended to achieve a goal, such as the solution of a problem.

Policymaking is part of an ongoing process that does not always have a clear beginning or end. Understanding who will and will not benefit from policies are continually reassessed, revisited and revised.

Human Resources Policy: Human resource policies are the formal rules and guidelines that organizations put in place to hire, train, assess, and reward the members of their workforce.¹

Policy Analysis: Policy analysis is the process of identifying different policy options that could solve a problem or achieve an intended outcome. Policy analysis compares options using transparent criteria to decide which policy option to adopt.

Status Quo: The current state of how things operate.

Evaluative Criteria: Evaluative criteria can change with every policy analysis depending on which criteria decision makers give the most "weight" to when making a decision. Naming evaluative criteria is important because it makes decision making more transparent: why did decision makers chose to implement one policy option over another? For example, if the only two criteria being considered are administrative efficiency and racial equity and Policy A is more administratively efficient and Policy B is more effective at advancing racial equity but decision makers chose to implement policy A, they prioritized administrative efficiency over racial equity. It is of course not always this simple, but choosing criteria is an exercise in transparency. Some examples of evaluative criteria include:

- Efficiency: How cost effective is the proposal?
- Racial Equity: Does the proposal reduce racial disparities and advance racial equity?

¹ See "Human Resource Policies Law and Legal Definition," Date Accessed: January 2020 (<https://definitions.uslegal.com/h/human-resource-policies/>)

- Equity: Does the policy disproportionately benefit or burden certain groups?
- Administrative efficiency: What is the burden of energy, time, money, personnel, materiel, etc. to implement the policy?
- Legal feasibility: To what extent is the policy recommendation legally feasibly given Home Forward's regulatory context?
- Effectiveness: To what extent will the policy attain the intended goals and outcomes?

Procedure: A series of actions conducted in a certain order or manner.

Difference Between Policy and Procedures

Policy	Procedure
Have widespread application	Have a narrower focus
Change infrequently	Are subject to change and continuous improvement
Are expressed in broad terms	Are a more detailed description of activities
Are statements of what and/or why	Are statements of how, when, who, and sometimes what.
Answer major operational issues	Detail a process

Policy Elements

Home Forward's policies will include:

- A clear articulation of "what" the policy is intending to achieve (the intended outcomes),
- How the policy will reduce racial disparities and advance racial equity,
- How achievement of outcomes will be evaluated, and
- Who is in charge of understanding and implementing the policy.

Procedures Manual Elements

If necessary, Home Forward policies will have an accompanying procedures manual that outlines "who" will implement specific aspects of the policy and "how" those aspects will be implemented.

Policy Development and Change Process

Home Forward will use an inclusive process to develop new policies and regularly evaluate existing policies. This includes both policies that impact residents and participants of Home Forward programs and employee focused policies. The process will result in policies that reduce racial and ethnic disparities and advance racial equity.

Internal Policy Agenda Setting

Home Forward will proactively set an internal policy agenda each year which will outline the policies that the agency will evaluate, develop, or implement. Home Forward will engage with people who are most impacted by the organization's policies and procedures, including current residents, participants, and staff, to get feedback on which policies Home Forward should include on their internal policy agenda each year. Home Forward will center the feedback and expertise of residents and participants when finalizing the internal policy agenda. Home Forward may include policies on the annual internal policy agenda that were not recommended by the people most impacted by the policy but should prioritize agency capacity to evaluate or develop policies lifted up by residents and participants.

In addition to getting recommendations from staff, residents, and participants on which policies to include on the internal policy agenda, Home Forward should also consider the following when finalizing the internal policy agenda:

1. Priorities of external partners with shared mission and values (e.g., the Urban league's work on reducing criminal screening criteria);
2. Alignment with Moving to Work flexibilities;
3. Department capacity;
4. Policies that reduce barriers to Home Forward programs;
5. Policies that promote housing stability of residents and participants;
6. Home Forward's strategic planning goals.

Policy Evaluation & Development

Home Forward will regularly review existing internal policies to understand whether the policy is achieving its intended outcome, including reducing racial disparities and advancing racial equity. Based on this analysis, Home Forward will adjust the policy as necessary to advance racial equity and achieve other policy outcomes.

When developing new policy or evaluating an existing policy, Home Forward staff should go through a policy analysis process that centers resident, participant, and staff voice. This process should, to the greatest extent possible, include an evaluation of different policy options to support the agency in making informed and intentional decisions about policy changes. Because no policy is race neutral, as all policies operate in a context that creates and reinforces racial disparities, each policy must actively reduce racial disparities in outcomes and advance racial equity.

A policy analysis process should include:

1. **Clarity on the problem** the policy is intended to solve **or the outcome** the policy is intended to achieve.
2. **Developing consciousness** about the nature and extent of the problem and ways that other people

or groups have attempted to solve the problem or achieve the outcome you have identified. At a minimum, staff should compile available data on current racial disparities in outcomes.

3. **Develop policy alternatives** (different policy options) that could address the problem/outcome the policy is intended to address.
4. **Select criteria** to evaluate your policy alternatives. Home Forward policy development and evaluation should always include racial equity as a criteria.
5. **Evaluate different alternatives** using transparent criteria you have selected to understand the potential outcomes of each alternative.
6. **Confront the potential outcomes and unintended consequences** of each policy alternative (i.e. confronting the tradeoffs) to compare the policy alternatives against one another.
7. **Propose a recommendation** about which policy Home Forward should implement based on your analysis.

Each policy will have a point person or Department. Once the internal policy agenda has been set, the Director of Policy will collaborate with or support each Department in evaluating or developing a policy as needed.