September 28th, 2020

California Air Resources Board

1001 I Street

Sacramento, CA 95814

**RE: Public Comments on the CARB 2021-2024 Triennial Strategic Research Plan**

Dear Members of the California Air Resources Board and staff,

On behalf of the Greenlining Institute, I would like to express our request for your consideration of our suggestions regarding the CARB 2021-2024 Triennial Strategic Research Plan.

Founded in 1993 as an answer to redlining, the Greenlining Institute advances economic opportunity and empowerment for people of color through advocacy, research and leadership development. Since 2011, Greenlining has been on the cutting-edge of research and advocacy efforts to ensure low-income people of color benefit from and have access to clean, safe and reliable transportation.

The Greenlining Institute's public comments on this topic are not focused on the specific research topics, but rather on how to conduct research funding and projects in a more equitable, partnership-based way. As equity in all of its forms has risen to the forefront of mainstream consciousness, researchers of all stripes—academic, government, and non-governmental organizations—are being funded to conduct racial equity research and evaluations. Researchers without expertise in racial equity are now being asked to draw conclusions about the racial equity impacts of their research. Scrutiny around whether research practices themselves are equitable, regardless of whether racial equity is the subject of study or not, has increased. For example, many research funders—foundations and governments alike—now require specific attention to racial equity and community engagement. While this presents an exciting opportunity to advance racial equity, researchers lack clear standards, guidelines and accountability for racial equity research and for how to conduct all sorts of research in an equitable manner. Consequently, racial equity research often comes across as elitist, extractive, tokenizing and opportunistic—particularly when researchers expect community partners to share their expertise without compensation. This erodes trust between community partners and researchers and impedes the ability to foster real change.

Research institutions and funders should understand how funding structures can undercut community engagement and involvement, and how lack of diversity and cultural competency can create blinders. Funders should promote true partnerships between research institutions and community partners. Researchers should work over the long term to establish trust with the communities they wish to study rather than seeking a superficial “equity stamp of approval.” They should work with community partners in ways that give those partners a meaningful role in the design and conduct of the research—more than just vague “input” that is easily dismissed.

The Greenlining Institute overarching recommendation is that CARB should incentivize researchers and research institutions to adopt the 5 steps of our [Making Racial Equity Real in Research report](https://greenlining.org/wp-content/uploads/2020/09/Greenlining-Making-Racial-Equity-Real-2020.pdf).

Summary of Recommendations:

1. Understand the context of racism in research in the past and present
2. Review the challenges, best practices, and opportunities for centering racial equity in research
3. Conduct an internal equity assessment of your research institution, department, or team
4. Partner with and pay a community partner
5. Co-create the research questions and scope of work with a community partner

Below, we lay out more specific recommendations targeted at research funders to incentive equitable, partnership-based research, How the report also has specific recommendations for researchers and research institutions to address these challenges.

**Challenge 1: Research Funding Structures**

The way that research grants are structured often fail to incentivize research institutions to work with community partners or to dedicate sufficient budgets for community engagement. This issue can stem both from the funding restrictions within grants and also from how researchers and research institutions create their budgets. Government funding is often restricted from funding critical community engagement costs or compensation of community members for their time and expertise. Beyond just compensation, grant funding structures often do not allow community partners to be co-principal investigators. Partially as a result of funding structures that fail to promote the growth of meaningful partnerships, community partners can often feel tokenized, unheard, and as if researchers are simply seeking an “equity stamp of approval” as opposed to genuinely wanting to partner on co-creating a research scope of work and deeply engaging communities.

**Recommendations for research funders such as CARB:**

* **Funders should support in-house research led by community partners.**
	+ For example, see the Asian Pacific Environmental Network’s [Mapping Resilience](https://apen4ej.org/wp-content/uploads/2019/10/APEN-Mapping_Resilience-Report.pdf)14 report.
* **Funders should require equitable partnership models and community engagement** throughout their grant proposals. Examples include:
	+ The [Civic Innovation Challenge grant](https://www.nsf.gov/funding/pgm_summ.jsp?pims_id=505728)15 that requires cross-sector teams from academia, community partners, and government.
	+ Requiring evidence of a detailedcommunity engagement plan in the proposal and a letter of support from a community partner confirming that this plan has been co-developed.
	+ Requiring explanation of how community feedback will be integrated into recommendations
* **Funders should communicate equitable partnership and community engagement expectations by providing guidance** and examples that set a baseline, not a ceiling.
* **Funders should hire community partners to conduct racial equity trainings** for researcher grant recipients. For example, the California Air Resources Board worked with Greenlining to develop racial equity training for a UC Berkeley research team that they funded.
* **To evaluate and award grant proposals, funders should develop scoring criteria for equitable partnerships**, co-created scopes of work, and community engagement practices.
* **Funders should ensure that staff who evaluate grant proposals have** a deep understanding of racial equity issues, such as by requiring racial equity trainings.
* **Funders should encourage research institutions to uplift community partners as co-principal investigators** with shared leadership and decision-making power. Grant applications should indicate *how* the partnership will be rooted in power-sharing.
* **Funders should require dedicated portions of budgets for community engagement and to compensate residents**, community-based organizations, and other participants for their time and expertise.
* **Funders should ensure that food, childcare, transportation, compensation and other relevant community engagement costs are eligible expenses within grants,** and should encourage that these items be included in grant proposal budgets.

**Challenge 2: Research timelines do not allow for building meaningful, trusting relationships.**

The timelines of funding opportunities run counter to developing trusting relationships between research institutions and community partners. Researchers may have to quickly conduct outreach to scope potential partners under time constraints to meet application deadlines. These timelines also drastically underestimate the length of time needed to conduct outreach and engagement during project implementation. Additionally, as a result of complex payment processes, this lag can place undue financial hardship on community partners while they contribute their labor and resources. This dichotomy exemplifies how research grants can often place more importance on meeting funder-driven deliverables and timelines [as opposed to prioritizing racial equity goals](https://www.cacgrants.org/assets/ce/Documents/2019/WhiteDominantCulture.pdf),16 compensating community partners in a timely manner, community engagement, and capacity and trust building.

**Recommendations for research funders such as CARB:**

* **Research funders should build in more flexible timelines** and allot more time than anticipated for trust building, payment to partners, and community outreach and engagement -- throughout the application, planning, and implementation phase.
* **Research funders and research institutions should prioritize multi-year funding** to help grantees build long-term relationships with communities in order to ensure that community needs shape research processes and outcomes.

**Challenge 3: The motivations behind research often conflict with community priorities and substantive policy change.**

Oftentimes the role of research is to “study and report” and is not necessarily to “fix” problems that have been vetted up front with impacted communities. Society needs research that points solutions to problems -- in a way that is vetted by the impacted communities.

**Recommendations for research funders such as CARB:**

* **Incentivize and support the value and benefits of relationship-building** with community partners and other research participants.
* **Conduct their own community engagement to understand community problems, needs, priorities** and how to fund programs in a more equitable and action-oriented way.
* **Partner with university deans, research and academic associations and community partners about how to approach issues such as motivations**, racial equity in research, community engagement, and funding models.

**Challenge 4: Methodologies, data collection, and analysis can perpetuate inequities.**

Academia’s focus on peer-reviewed sources of research can often exclude and devalue research and publications from community partners that have not been peer-reviewed. This can lead to research and analysis methodologies decided by outsiders as opposed to communities and an over-emphasis on the often preferred quantitative data.

Academia’s peer review process exists in an academic publishing silo that can be detached from the real world. Peer reviewers are traditionally drawn from fellow academics and not community partners or members of affected communities. This can lead to research and analysis methodologies decided by outsiders as opposed to vetted by communities and an overemphasis on quantitative data. In combination, this can undermine consideration of people’s lived experiences and contributes to inequity in research.

Furthermore, when research teams do not reflect the demographics or lived experiences of communities, researchers may have blind spots and therefore may conduct the data collection or analysis in a way that is not culturally sensitive. For example, a researcher may not think to disaggregate the data of broad racial groups like Asian Americans -- which obscures their disparities, stories, and individual needs.

Researchers can be reluctant to recognize that there are different measures of success. A community partner may define success in a different way from the researcher. Furthermore, failure should be recognized as a success, as there is a critical value in collecting lessons learned.

**Recommendations for research funders such as CARB:**

* **Research funders should require that** [**qualitative data**](https://masscommtheory.com/2011/05/05/writing-good-qualitative-research-questions/)**21 is also collected, in addition to quantitative.** To foster this, funders should consider requiring interdisciplinary research teams that have experts with both skill sets.
* **Research funders should require that community partners drive conversations around what types of data is collected** (both quantitative and qualitative data) and how to collect it.
* **Research funders should require grantees to report how stakeholder and community input informs the research** process, methodology and data collection.

**Challenge 5: Lack of diversity, equity and inclusion in the research field.**

**Recommendations for research funders such as CARB:**

* **Funders should prioritize grants to researchers from underrepresented demographics.** Specific support should be provided to connect underrepresented faculty to funding opportunities and pathways to participate in peer review processes.

**Challenge 6: For-profit academic journals are widely seen as exploitative and inequitable**

The business models academic publishers use a variety of [unethical practices](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1557876/)40 to poach enormous profits. They rely on government or foundation-funded research to be handed over for free, peer reviewers who operate on a pro bono basis, and then they sell the final product back to universities to be read by researchers at sky-high rates. This model prevents researchers and community partners without journal memberships from accessing key information hidden behind their paywalls. Furthermore, if a researcher does want to publish in an open-source format within a for-profit journal, they must pay for it, which may end up diverting funds from other items such as community engagement. For-profit academic journals ultimately control what is published and then remain the gatekeepers of knowledge, which further entrenches inequitable practices in academia.

**Recommendations for research funders such as CARB:**

* Research funders should require open access to all research projects that they fund.

**Challenge 7: Research funders prioritize academic institutions over community partners**

Funders often hold academic institutions in higher regard while overlooking the ability of community partners to conduct their own in-house research -- a perception that further contributes to an inequitable distribution of research funding and power. Community partners are very well positioned to conduct their own research because of their ability to reach the target populations more effectively -- yet many are held back due to limited capacity or technical expertise.

**Recommendations for research funders such as CARB:**

* **Funders should ensure that community partners and non-academic research institutions are eligible for leading research projects.**
* **Funders should provide capacity building and technical assistance** to under-resourced community partners to apply for research grants and to those who are conducting research. Just as funders aim to build the capacity of community partners to improve their operational, financial, and leadership structures, funders should also aim to build their capacity to conduct research and evaluations within their communities.

In order to deliver more equitable outcomes, California must first begin with embedding equity into our research practices. Thank you for your consideration of the recommendations above.

Sincerely,

Hana Creger,

Environmental Equity Program Manager.