Summary of Community Comments and Agency Responses on the California Air Resources Board Community Engagement Model

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Introduction

Background on this document: This document summarizes major public comments on the California Air Resources Board (CARB) [Community Engagement Model](#) (Model) and the agency's responses to those comments. It is part of a package of documents that includes:

1. The revised Community Engagement Model.
2. A comment table listing individual public comments received on the Model and CARB's response to each comment.
3. A summary of recommendations to strengthen relationships with communities (Recommendations to Strengthen Community Relationships), generated from public comments.

Model Background: The Model is a living internal guidance document containing information to guide CARB staff on appropriate community engagement practices. It aims to help CARB staff gain the knowledge, tools, and confidence needed to consistently design and implement effective community engagement strategies. Moving forward, this Model will help CARB improve its ability to build and maintain relationships with communities throughout the State, especially communities impacted by inequalities, including racial inequalities. The Model is designed to support CARB's mission to serve the public in California. CARB has a civil rights obligation to all to ensure equal access and no barriers to the benefits of its air quality efforts based on protected categories like race, age, or sex. Consistent with CARB Resolution 20-33, CARB seeks to build relationships with communities most impacted by air pollution who have experienced limited access to government staff and decision-makers.

Model development: Staff ensured the Model was developed in partnership with diverse community voices. The Model was developed through engagement with [19 contracted Community Experts,](#) 9 virtual and in-person [Public Dialogue Sessions](#) with nearly 300 attendees, and individual conversations with Community-Based Organizations (CBO) and the public. The Community Experts provided written and verbal feedback over email and during [four virtual meetings.](#) Staff held Public Dialogue Sessions from January 2023 through April 2024 in Yuba City, Salinas, Oakland, Riverside, and virtually. During these sessions, the public provided general feedback on how CARB can strengthen its community engagement efforts. CBOs and the public also provided individual comments on the Model and CARB's community engagement efforts, more generally, through voicemail, email, individual meetings, and an online public docket. In total, the Model development process generated

about 2,800 comments.

Throughout the Model development process, communities requested detailed information about how their input impacts CARB's work. As a result, staff committed to being transparent about Model revisions by recording and responding to each comment received, even though CARB is not legally required to respond to public comments for this internal guidance document. All public comments and CARB responses are in a comment table on the [CARB website](). This summary document synthesizes the feedback received on the Model and CARB's responses to that feedback.

Staff took a "yes" approach in responding to Model comments that honors the community members' expertise and time spent improving the Model and CARB's community engagement efforts. This "yes" approach means that staff worked to incorporate as much of the feedback received as possible into the Model. When an entire comment could not be accepted, staff aimed to incorporate the essence or intent of the comment into the Model. If a comment could not be incorporated into the Model, rationale was given for that decision.

What is in this document: This document includes topics Community Experts noted must be addressed in the Model. It also covers topics the Community Experts expressed should not be in the Model. This document also includes categories with significant public comments that emerged in the nine public meetings.

Each category in this document includes a summary of community members' comments on the topic, CARB's response to those comments, and the relevant sections in the Model where comments were incorporated. Overarching comments include topics such as developing staff skills; promoting diversity, equity, and inclusion; improving engagement; power sharing; evaluating engagement efforts; and Model accessibility.

What is not in this document: While CARB tried to minimize the number of comments not incorporated into the Model, this document addresses non-incorporated topics that were shared with CARB multiple times. Some of the comments not incorporated into the Model were included in a public summary, Recommendations to Strengthen Community Relationships. These comments may require additional resources. The summary includes topics such as community decision-making power, agencywide transparency, removing barriers to public participation (which includes stipends, childcare, and food), Tribal engagement, and addressing past and current harm to communities. Detailed explanations of these topics can be found in the summary and are not detailed in this document.

Staff Skills

Cultural Competence & Recognizing Community Differences

Community Comment: The Model should promote cultural competence, which requires understanding and respecting the cultural nuances and values of the community. The Model should emphasize the importance of recognizing and respecting the unique characteristics of each community to avoid assuming all communities are similar. Additionally, CARB should employ culturally appropriate communication strategies to foster trust and inclusivity.

CARB Response: Staff should be able to understand, communicate with, and effectively interact with people across multiple cultures. In addition to defining cultural competency, the Model emphasizes the need for staff to respect and appreciate cultural differences. The Model also guides staff on researching communities before they begin engagement efforts to better understand community histories and areas of concern. Various trainings on diversity, equity, and inclusion have been added to the Model to help educate staff on these topics. Cultural competency training is in the Recommendations to Strengthen Community Relationships. Finally, the Model includes examples of cultural competence and lists cultural competence as a desired characteristic for staff facilitating community engagement events.

Relevant Model Sections: "What is Needed for Successful Community Engagement?"; "Key Principles of Community Engagement"; "Do staff have cultural competence?"; "Have you researched the community and location?"; "Appendix IV: Resources and Trainings Available to CARB Staff"

Addressing Abuse and Harassment, Conflict Resolution, Training and Preparation

Community Comment: The Model should stress the importance of adequately preparing and training outreach teams to respond to high conflict situations. It should include a robust plan to address harassment during community engagement and how to address conflicts respectfully and effectively. This is crucial for fostering a safe and respectful environment for all participants.

CARB Response: The Model includes guidance on identifying the appropriate staff for community engagement efforts. This includes selecting staff with community engagement experience, a deep understanding of equity, cultural competency, conflict resolution skills, and active listening skills.

"Safe and respectful space" is one of seven core community engagement principles highlighted in the Model. This principle emphasizes the importance of practicing nonviolent communication through compassionate behavior and interactions. The Model clearly defines harassment and offers robust guidance on how staff should

address harassment during public events. Staff are also given tools to understand the difference between high emotion or passion and harassment and who to contact during and after events, where appropriate.

The Model recognizes that staff will need facilitation training to effectively cover sensitive and controversial issues that may arise. The Model highlights several helpful trainings and resources available for CARB staff to help develop their interpersonal, conflict resolution, and facilitation skills. The Recommendations to Strengthen Community Relationships contain suggestions for additional trainings to improve staff skills. The Model also encourages staff to partner with trained facilitators and guides how to select the appropriate facilitator. The Model reminds staff to create a welcoming environment, focus on the content rather than the tone, and provide space for passionate conversations.

Relevant Model Sections: "What is Needed for Successful Community Engagement?"; "Key Principles of Community Engagement"; "Which staff should be involved?"; "Do staff have cultural competence?"; "Host the Event"; "Continuing Relationships"; "Appendix IV: Resources and Trainings Available to CARB staff"; "Appendix V: Facilitator Selection Criteria and Skillset"Promoting Diversity, Equity, and Inclusion

Inclusivity and Diversity

Community Comment: The Model should ensure representation from all segments of the community, including groups experiencing marginalization. It should also include diverse voices, perspectives, and experiences, fostering a rich and inclusive community dialogue.

CARB Response: Meaningfully involving the diverse perspectives of those most impacted by pollution and environmental injustice will help to ensure a better California for all. Thus, the Model lists diversity, equity, and inclusion as key principles for community engagement. The Model also provides several tools to help staff identify and engage with diverse communities, including questions to understand who should be engaged regarding program and policy efforts. Moreover, the Model helps staff develop community outreach and engagement plans that center diverse people, ideas, and voices. Guidance on inclusive engagement materials in the Model includes but is not limited to providing resources in plain language, translating materials, and having interpreters so all communities can engage.

Relevant Model Sections: "Key Principles of Community Engagement"; "Before Planning Your Community Engagement"; "Planning Your Community Engagement and Conducting Outreach"Undocumented Residents, Faith Communities, and Youth Engagement

Community Comment: The Model should acknowledge and include undocumented residents, faith communities, and youth as important groups with specific outreach

and engagement needs. The Model should guide staff on outreach and engagement approaches for these groups.

CARB Response: The Model identifies undocumented residents, religious leaders, congregations, youth organizations, and youth centers in the list of interested parties to be engaged. This list, along with the reference questions on how to identify the groups impacted by CARB work, should help staff acknowledge and include the groups described in this section. The Model guides staff on how to identify and meet community needs. This includes reducing barriers to participation that may be unique to different communities and using effective and engaging outreach materials that attract the intended audience. The Model also encourages staff to partner with organizations with more experience and expertise working with specific priority populations.

Relevant Model Sections: "Identify Broad Audiences"; "Table 1. Examples of interested parties"; "Which local communities or community-based organizations can you partner with?"; "Identify and Implement Outreach Methods"Discretionary Decision-Making

Community Comment: CARB should refrain from deciding who should participate in engagement efforts and who has a large influence on decision-making. The Model should encourage staff to select members of the public randomly to promote fair and unbiased participation and community representation in CARB's engagement efforts. Democratized lotteries can help ensure that engagement efforts are inclusive and consistent. The Model should also encourage statistically valid polling.

CARB Response: Staff appreciate the request to address fair access. The Model references two examples of democratic lotteries: The Petaluma Fairgrounds Advisory Panel and The Toronto Planning Review Panel. These examples will allow staff to learn more about the topic. It will also allow them to use this practice as pilot projects for programs that might work well under this structure.

The Model does not suggest using democratic lotteries universally. This approach will not work as a standard agency practice because of the constraints and scale of many of our programs. As a public agency, all processes are open to the public to either apply to participate or to participate in open meetings. For example, many regulatory and solicitation programs are bound by statute to be open to the public. Funneling feedback through a democratic lottery reduces our ability to be open to all. Also, the scale of many programs at our agency is the entirety of the state. It would be very difficult to get adequate representation throughout the state to meet the statistical needs necessary for the democratic lottery. The resources needed to sustain that level of participation are unavailable. Additionally, engagement is often focused on specific CARB actions that may or may not be relevant to different people; thus, using a lottery system could reduce access to people who stand to be most impacted.

In terms of increasing our outreach to include new and more diverse voices in CARB's processes, the Model is designed to help the agency improve its ability to build and maintain relationships with communities throughout the State, especially communities impacted by inequalities, including racial inequalities. The Model highlights that outreach communications should be intentional, consistent, concise, and thoughtful. The Model guides staff to tailor outreach for each community and provides a range of activities to broaden event participation. The Model has a thorough list of interested parties to encourage conducting outreach and engagement with diverse audiences. The Model encourages early outreach to increase community awareness and participation. It also emphasizes working with other agencies and community-based organizations to plan early and seek to effectively use available resources. This includes streamlining events when possible and checking for competing events. These approaches should maximize our outreach and allow for more representation of community voices.

Relevant Model Sections: "Identify Broad Audiences"; "Identify and Implement Outreach Methods"; "Planning Your Community Engagement and Conducting Outreach"; "Plan the timing" "Appendix XII: More Engagement-oriented Outreach Examples"Exclusion of Diverse Perspectives & Tokenizing Practices

Community Comment: The Model should promote genuine representation and inclusivity by incorporating diverse perspectives into CARB systems and processes. It should avoid tokenizing engagement practices, meaning staff should not ask communities to participate in processes or approve plans that CARB has already fully developed. Community engagement should significantly influence CARB plans or processes.

CARB Response: A major aim of the Model is to foster equitable outcomes for affected parties by rooting CARB actions in community needs. The Model is designed to offer alternatives to "Decide, Announce, Defend," by having the public actively participate through engagement during the development of CARB actions. The Model guides staff to clearly identify when, how, and where community engagement can impact a process or decision and to be clear about that with communities. It encourages engagement early and often to shape processes and CARB actions. The Model guides staff to be transparent with communities when a decision cannot be influenced to avoid tokenizing processes. The Model's introduction contains information on the importance of obtaining diverse perspectives on CARB's work. Also, the Model contains a list of questions that emphasize diversity and inclusion, along with a thorough list of examples of interested parties to help staff brainstorm all the potential voices they should include in their engagement efforts. Throughout the Model, guidance is given on integrating diverse community voices into CARB actions early and often in all processes. The Model guides staff to use more equitable processes because this should support efforts to cause more equitable outcomes.

Relevant Model Sections: "What is Meaningful Involvement"; "What is Needed for Successful Community Engagement"; "Key Principles of Community Engagement"; "Why Does Community Engagement Matter?"; "Practices to Avoid During Community Engagement"; "Before Planning Your Community Engagement"; "Table 1: Examples of interested parties"

Improving Engagement

Sufficient Elaboration in Action Summaries

Community Comment: The Model should provide sufficient elaboration in action summaries.

CARB Response: To help build trust and transparency in the community engagement process, the Model encourages staff to develop an approach for tracking feedback before holding events. One suggested tool is a public Summary Action Table. This table tracks all feedback received and clearly identifies which comments were incorporated, not incorporated, or fell outside the scope of the action. The Model also recommends posting meeting summaries with the objectives of the engagement event; discussion agreements; links to any presentations, materials, or resources; a summary of questions, discussion items, and activities; and actionable next steps. An example Summary Action Table and meeting summary are provided in the Model.

Relevant Model Sections: "All events"; "Following-up with Communities"; "Appendix XX: Summary Action Table"; "Appendix XXII: Meeting Summary Approach and Example"Transportation Access Consideration

Community Comment: Beyond engagement activities, the Model should prioritize transportation access. Ideally, engagements should be accessible by public transit, ensuring broader community participation.

CARB Response: The Model considers transportation access a potential barrier to community engagement. Staff must be mindful that public transportation may not be robust in some communities, and people could have trouble accessing the meeting venue. Staff should select central meeting locations with access to multiple transportation sources and work with communities to choose appropriate, accessible venues. The Model encourages staff to identify instances when transportation agencies, local governments, local groups, or private partners have programs or funding for transportation. The Recommendations to Strengthen Community Relationships includes a summary of this topic.

Relevant Model Sections: "Are you considering community needs?"; "Ensure event access"; "In-person events"Use of Community Stories

Community Comment: Community stories were highlighted as a powerful tool for sharing data. The Model should encourage collecting data-driven stories, visualizing data alongside narratives, and creating dedicated platforms for ongoing community

engagement.

CARB Response: Community engagement allows communities to share their expertise to strengthen CARB actions. As a result, the Model encourages staff to be aware of, respect, and incorporate relevant knowledge gained from communities into CARB actions. The Model encourages staff to include other ways of knowing, like qualitative data or traditional ecological knowledge.

Relevant Model Sections: "How will you evaluate your engagement metrics?"; "Consider qualitative data and Traditional Ecological Knowledge "; "Are your engagement events collecting qualitative data?"; "Event evaluation"; "Surveys"Continuous Follow-up

Community Comment: The Model should promote continuous follow-up after every interaction with communities. This involves ensuring sustained community involvement and effective feedback mechanisms.

CARB Response: Consistency in communication is critical to building and maintaining community relationships. The Model offers staff guidance on following up with communities in a timely manner. Follow-up includes informing the public about how their feedback was considered, how it influenced the CARB action, any next steps, and sharing progress through annual reports. In terms of having effective feedback mechanisms, the Model provides tools for staff to evaluate their engagement efforts and emphasizes making time for evaluations and debriefing meetings. Proper evaluations will help staff to identify whether the appropriate mechanisms are in place. The Model also discusses evaluating and providing reports on racial equity outcomes.

Relevant Model Sections: "What are the Goals of the Community Engagement Model?"; "Identify Initial Engagement Logistics"; "Implementing Your Community Engagement Plan"; "Immediate Event follow-up"; "Following-up with Communities"; "Evaluate Your Engagement"Clear and Collaborative Charter Development

Community Comment: A clear charter for group coordination is essential for community engagement. The Model should encourage the collaborative development of charters with group members to avoid top-down charter development and to ensure transparency and effective coordination of activities.

CARB Response: The Model encourages staff to co-create group charters with community partners to ensure that everyone mutually determines how to work together and to potentially prevent the engagement process from being extractive. However, not every engagement effort will require the use of a charter. For example, some situations may not involve a consistent group that meets regularly. The Model highlights the importance of co-creating meeting agreements. These agreements will help to clearly define how folks work together during shorter interactions.

Relevant Model Sections: "Which local communities or community-based organizations can you partner with?"; "During the event"Staff Contact Information

Community Comment: CARB should provide an organizational chart and staff contact information so that communities know who to contact about a CARB program.

CARB Response: CARB's organizational chart does not describe every CARB program and is constantly in flux so other resources for contacting staff are appropriate. CARB websites have contacts for program staff and the Model encourages staff to designate a point of contact, provide contact information, and be available after engagement events to keep lines of communication open with communities.

Relevant Model Sections: "Immediate Event Follow-up"; "Following-up with Communities"; "Table 16: Community engagement event worksheet"Over-Surveying and Lengthy Meetings

Community Comment: The Model should discourage excessive surveys and prolonged meeting durations over two hours.

CARB Response: The Model encourages staff to tailor their surveys to the community groups they are working with, given that different communities and individuals will have different preferences for the length and type of evaluations they complete. Staff are reminded to design the format, content, length, and timing of meetings with the community contacts. The example event questionnaire in the Model reminds staff to limit the survey length to encourage higher response rates. The Model emphasizes that staff need to express gratitude to participants during and after engagement events, including not pushing participants to stay past meeting times if they are unwilling. Also, the Model includes the ability to maintain focus and time management as a key skill for an event facilitator. This includes ensuring efficient and effective use of meeting time.

Relevant Model Sections: "Table 6. "Example event questionnaire"; "Immediate Event Follow-up"; "Appendix V: Facilitator Selection Criteria and Skillset"

Action Processes "Lower" than Collaboration

Community Comment: The Model should encourage collaborative approaches for impactful community engagement. Completing CARB actions through engagement processes considered "lower" than "Collaborate" on the IAP2 Spectrum of Public Participation should be avoided. Essentially, the Model should encourage staff to have engagement practices that allow for increased community decision-making.

CARB Response: The Model includes a variety of approaches to support collaborative engagement processes. CARB community engagement will always be within the "Inform" to "Collaborate" part of the IAP2 Spectrum of Public Participation (which includes "inform," "consult," "involve," and "collaborate."). The Model emphasizes that staff should identify and aim to meet community needs. This will help staff know

where on the IAP2 Spectrum of Public Participation their activities should fall and the best engagement efforts to deploy. Furthermore, the Model includes many examples of activities that are more robust and fall further to the right on the spectrum, which allows for increased impacts on decisions. Additionally, the Recommendations to Strengthen Community Relationships include more on this topic.

Relevant Model Sections: "Identify Where the Engagement is on the Engagement Spectrum"; "Table 7: Outreach Activity Examples"; "Table 10: More engagement-oriented outreach examples"

Lack of Flexibility and Accountability

Community Comment: The Model should underscore the need to adjust resources based on the unique needs and opportunities for each engagement, while also demonstrating accountability and results. Pitfalls to avoid include a lack of flexibility and accountability in outreach and engagement resources.

CARB Response: The Model incorporates the concepts of flexibility and accountability to respond to specific circumstances. The Model encourages staff to consistently check in with communities and to evaluate CARB's engagement efforts. These check-ins and evaluations should aim to ensure that engagement efforts meet community needs. If engagement efforts are not meeting community needs, staff are encouraged to alter their efforts where feasible and appropriate. The Model promotes accountability by encouraging staff to create and publicly post meeting summaries and Summary Action Tables.

Relevant Model Sections: "Are you considering community needs?"; "Following-up with Communities"; "Comprehensive Evaluation of Your Engagement Efforts"; "Appendix XX: Summary Action Table"; "Appendix XXII: Meeting Summary Approach and Example"

Power Sharing

Equitable Listening

Community Comment: The Model needs to guide staff in listening to all interested parties without bias. The Model should prioritize equitable listening and accommodate cultural, language, and other differences to ensure fair and inclusive community engagement practices.

CARB Response: The Model guides staff on how to listen to communities. Meaningful communication includes active listening and a multidirectional flow of information (e.g., not just top-down). The Model lists training available for staff to improve their cultural competency, listening and communication skills, and skills to hold welcoming meetings and build meaningful relationships. In addition, the Model provides staff with clear criteria for community engagement facilitators.

Relevant Model Sections: "What is Needed for Successful Community Engagement?"; "Understanding Community Engagement"; "Which staff should be involved"; "Before Planning Your Community Engagement"; "Implementing Your Community Engagement Plan"; "Manage the discussion"; "Appendix IV: Resources and Trainings Available to CARB Staff"; "Appendix V: Facilitator Selection Criteria and Skillset"

Community Empowerment

Community Comment: The Model should focus on empowering community members by providing them with information and resources to make informed decisions. It should be a transparent resource, fostering clarity about CARB processes and facilitating community participation.

CARB Response: The Model encourages staff to design community engagement to allow all affected parties to meaningfully participate in decisions that will impact their lives while ensuring that community engagement and the broader CARB action is addressing environmental injustices and advancing racial equity. One goal of CARB's future community engagement efforts, emphasized in the Model, is to equip communities with the information, resources, and capacity building needed to make informed decisions.

Relevant Model Sections: "How Should Staff Use the Community Engagement Model?"; "What is Needed for Successful Community Engagement?"; "Reasons to Conduct Community Engagement"; "Appendix XII: More Engagement-oriented Outreach Examples"

Community Self-determination

Community Comment: Upholding community self-determination as a core principle, the Model should recognize communities as interested parties and rights-holders in decision-making processes. This emphasizes the importance of involving communities in shaping their own destinies.

CARB Response: The "Safe and respectful space" core community engagement principle emphasizes the importance of respecting communities' right to self-determination and ensuring participants are always treated with dignity and respect to achieve meaningful community engagement.

Relevant Model Sections: "What is Meaningful Involvement?"; "Reasons to Conduct Community Engagement"; "Key Principles of Community Engagement"

Evaluations

Clear Metrics to Evaluate Efforts

Community Comment: Conduct evaluation processes with clear metrics throughout all community engagement efforts.

CARB Response: Evaluation is an essential step in community engagement. It allows

staff to make any necessary adjustments, capture valuable lessons, and identify opportunities for improvement. The Model describes event-specific evaluation, where participants assess how individual events went, and evaluation of the whole engagement effort. The Model guides staff to set up measurable goals, assessment approaches, and reporting mechanisms at the beginning of their engagement.

Relevant Model Sections: "Before Planning Your Community Engagement"; "Identity Evaluation Approaches"; "Comprehensive Evaluation of Your Engagement Efforts"; "Implementing Your Community Engagement"

Model Accessibility

Contents of the Model

Community Comment: The Model is too long, and the various template titles do not adequately describe each section's contents. The Model should contain more pictures and graphics to make it more engaging and aesthetically pleasing.

CARB Response: The Model is intended to serve as a reference guide for CARB staff to use throughout their engagement process. The Model was revised to ease readability. For example, worksheets and large tables were moved into appendices. Also, staff renamed and reorganized the previous "Narrative" and the "Plan, Implement, and Close" templates. The first section of the revised Model introduces community outreach and engagement, and California's history of environmental injustice. The other sections offer a step-by-step guide for CARB to prepare, plan, implement, follow up on, and evaluate community engagement efforts.

While the Model remains long, its length aligns with the complexity, nuance, and level of detail that staff need to provide consistent and meaningful community engagement. Staff have the responsibility, time, and training to digest large amounts of information and follow reference materials. Lastly, the Model will be accompanied by detailed training and a workbook to help staff work through it in manageable steps.

Staff have added a few more graphics into the Model. However, recommendations for more graphics will be considered when designing the training and workbook that will accompany the Model and with future versions of the Model.

Relevant Model Sections: The entire Model.

Avoid Acronym Confusion & Unclear Communication

Community Comment: The Model should avoid using acronyms without providing definitions or explanations. Avoiding overly technical processes and proceedings ensures accessible communication with all interested parties.

The Model should discourage using unclear language, jargon, technical terms, and acronyms. Clear and accessible communication is essential for meaningful

engagement.

CARB Response: All acronyms in the Model are defined. The Model suggests that staff use accessible language when engaging with the public, including defining and limiting acronyms and jargon.

Relevant Model Sections: "Language access and Americans with Disabilities access"; "Appendix X: Checklists for Accessible and Plain Language Materials"; "Appendix XXX: Community Engagement Acronyms"

Non-Iterative Approach

Community Comment: Emphasizing that the Model should not be an iterative document is crucial. The Model should provide clarity on its purpose and structure to avoid misunderstandings.

CARB Response: The introduction has been improved to clearly lay out the purpose, audience, structure of the Model, and the cyclical nature of engagement. It also provides an overview of how staff should use the Model.

Relevant Model Sections: "Introduction to the Community Engagement Model"

Model Implementation

Training

Community Comment: The Model should be accompanied by an engaging, informative, and concise training. Implementation of the training should also inform future editions of the Model.

CARB Response: Training on the Model will be developed in 2025. Staff have shared all training suggestions with the team leading the training development and Model implementation.

Relevant Model Sections: The entire Model.

Metrics of Success

Community Comment: In five years, successful Model implementation will be reflected by better health outcomes in overburdened communities, staff using the Model, community feedback being incorporated into CARB actions, better youth engagement, and stronger relationships between CARB and communities throughout the state.

CARB Response: Staff shared the suggested metrics with the team leading Model implementation.

Relevant Model Sections: The entire Model.