THE URBAN SEMINAR SERIES
ON CHILDREN'S HEALTH & SAFETY

Fielding Large-Scale Community Change Initiatives: Key Lessons from a Decade of Systems Change

What light does 10 years of experience with the Urban Health Initiative (UHI) shed on how advocates can realign public opinion, public decision making, and public funding to support large-scale social change? The UHI, funded by the Robert Wood Johnson Foundation, aims to spur measurable improvement in the health and safety of children in five cities nationwide. The initiative's ambitious strategy is systems change: a fundamental shift in policies and funding that propels the well-being of children to the top of the public agenda.

In May 2005, the Urban Seminar Series, hosted by Harvard University's John F. Kennedy School of Government, invited researchers, UHI leaders, community organizers, national and local evaluators, and officers from various foundations to examine the decade-long experience. The Seminar Series served as a critical component of the initiative for the past eight years and provided a forum for researchers and practitioners to consider how comprehensive community initiatives can maximize their likelihood for success. "When we first convened in 1997," notes Harvard University Professor and Seminar Series convener William Julius Wilson, "the site directors and their staff lamented that there was little documented evidence available that could help them…. increase their chances for success." The goal, according to Wilson, is to "bridge the gap between research and practice," and to "help chart a strategy for success for other change agents."

Toward that end, researchers examined the UHI experience in light of other large-scale initiatives and seminar participants debated their findings. While highlighting the many challenges confronting community change initiatives, including the UHI, the proceedings underscored important lessons for future change agents to consider when undertaking large scale initiatives. These lessons relate to expanding public awareness of the enterprise, using data to drive decision making, and ensuring that a rigorous evaluation helps inform the process and its outcome. It is worth noting that each of these lessons, proposed by the speakers and respondents, provoked significant discussion and debate. Similarly, some of the positive effects that are delineated are based on interviews with key informants and were not subjected to rigorous comparative analysis and as such they should be considered as suggestive and offer the opportunity for further reflection and testing among those interested in creating sustainable citywide change.

Core Lessons for Funders

Community change initiatives typically aim to "get to scale"— affect enough people and programs across a significant policy arena to make a measurable impact. However, the UHI has taken the concept "out of the speculative realm and made it usable," according to Harold Richman, director of the Chapin Hall Center for Children at the University of Chicago, and colleagues (1). Still, the rugged road to attaining that and other aims suggests lessons for funders and advocates hoping to spur systems change.

Getting their initiative to scale, whereby change agents succeed in expanding its scope and impact, is an important goal. However, doing so requires a shared understanding of the mission, clear strategy, and a sustained focus. Feedback from in-depth interviews with change agents underscores that they should not underestimate the time required for the planning phase of a large-scale initiative. Site leaders reported that they "struggled initially to grasp the magnitude and specificity" of the time, money, and effort entailed in getting to scale. The funding authority (in this case, the Robert Wood Johnson Foundation) and the National Program Office (NPO), which managed the initiative, needed to provide "more technical assistance and hands-on guidance than they had originally anticipated." However, by focusing on "concrete, quantitative outcomes—in this case, numbers served and dollars diverted/raised—site personnel eventually did hone their theory of change" and "organize their activities in a purposeful, rigorous fashion," say the Chapin Hall analysts. Doing so enabled participants to guard against "mission drift," back up ambitious visions of transformation with concrete goals, understand the substantial time usually required to achieve scale, and boost accountability—"critical elements often missing from foundation-sponsored community change initiatives" (1).

Community change initiatives can be political without being partisan. Although most nonprofit organizations are somewhat restricted in their ability to lobby public officials (and in the case of the UHI by the terms of their foundation funding), the UHI realized early on that real systems change must address the political realities that influence funding streams. Any attempt to redirect funds toward efforts to support children would require considerable political savvy on the part of change agents to "influence…. key political actors and institutions." To implement such a campaign, "sites needed to be adept at anticipating political change, educating and motivating new power brokers, and reframing their activities in light of changing conditions."

For example, the Youth Connection, the UHI affiliate in Detroit, made the need for greatly expanded after-school programs a critical issue in the 2001 mayoral race. After the election, Kwame Kilpatrick, the new mayor, formally partnered with the intermediary—which became Mayor's Time, housed in City Hall—to make the health and safety of children part of his core agenda. Realizing the need to garner political leverage, over the last several years sites also "overhauled their boards to include individuals with the political muscle and institutional savvy…. to serve as effective agents of change," says Richman. "While explicitly political strategies are clearly challenging, ignoring the political arena…. no longer seems like a viable alternative for a serious community change effort" (1).

To raise public awareness and create the political climate conducive to effecting change, sites also considered a communications strategy to "foster both the political and public will to push through and sustain" changes in policies and funding focused on children. However, designing and implementing a communications campaign that exerted a community-wide impact proved more difficult than expected. Challenges include the time needed to clarify objectives in order to effectively tackle messaging and political strategies, linking a communications campaign with other strategies for systems change, lack of specialized experience in mounting such a campaign, and "competition in the marketplace of ideas, and insufficient resources." The UHI approach also "assumed that if city residents could understand children's services issues better…. the resources would flow." However, some sites lost considerable up-front time trying to find a communications strategy that could effectively focus attention on a complex mission that required more than snappy sound bites. Crafters of such initiatives therefore need to "identify how people working on future community change efforts should design, state, operate, and evaluate an approach to communications" (1).

A strong emphasis on data can give large-scale social change initiatives an "objective way to establish their priorities, focus their activities, and measure their effectiveness." However, "foundations must take the initiative in encouraging change agents to develop the ability to gather data, "help frame the activity, negotiate agreements among those involved, and monitor the results in the early years," say the Chapin Hall analysts. In the case of UHI, 10 years ago, as the initiative was just beginning, "few of the cities had a comprehensive or coordinated data infrastructure regarding children's services." Indeed, the site leaders themselves and the UHI had a difficult time comprehending what it would require to create a database of important indicators of child and family well-being for each city. The sites therefore had to "devote significant time and energy to aggregating and synthesizing isolated data streams and developing their own capacity to analyze them." Nevertheless, these efforts paid off, and demonstrate the value for cities of "permanently improving the capacity…. to collect data on children's health and safety outcomes, and to use these data to guide their decision making."

Large-scale initiatives need to build on existing local efforts and resources. In their zeal to bring about improvements in the status quo, even the most careful strategizers overlook important resources that already exist in their communities. New initiatives "spend a great deal of time up front recruiting, hiring, and training staff," composing their boards, and "building and sustaining relationship with key constituencies," Richman points out. In so doing change agents often overlook chances to build upon initiatives that already have a foothold in a community. He urges advocates to understand "a community's dynamics, its leadership, its existing activities, and its potential for success, and then nurture all those."

Change agents can't just "walk into a community and say, 'I have my new idea now, and I need the best leadership, the most money, and most of your time,' and expect that people will coalesce around you," agrees Charles Royer, former mayor of Seattle and director of the UHI National Program Office. Reflecting on important lessons learned directing the UHI, Royer notes that "new ideas need to be surfaced and encouraged and we may have missed opportunities to build on some good work [already under way] in the communities."

Rather than requiring applicants to compete for grants, foundations should consider funding all who reach a "threshold of readiness." The competitive grant-making process creates winners and losers among applicants and foundation staff alike. Indeed, because the UHI initially featured competition among 20 cities, "sites were hesitant about sharing ideas and asking each other for advice during the initiative's planning phase…. [and thus] failed to develop a culture of mutual exchange," the Chapin Hall analysts found.

Competitive grant making also forces foundation staff to spend most of their time "figuring out what to say no to" rather than "adding value to what they said yes to," says Karl Stauber, president of the Northwest Areas Foundation. To avoid such impacts, his foundation no longer accepts grant applications, distributing funds instead solely on its own initiative. Another approach is for foundations to "fund

all sites in the initial pool that meet a given threshold of quality by the end of the planning phase," says Richman.

When it comes to systems change efforts, Foundations need to experiment with long-term funding strategies and continue to monitor their effectiveness over time. Stauber laments the prevailing "connect-the-dots culture" among funders and grantees alike, who "patch together a series of short-term grants and only later "figure out what the picture is." That approach often fails in the case of systems change, which requires funders to take risks and allow an initiative to mature. Advocates need time to develop myriad connections at local, state, and federal levels to influence "who is in the conversation, what the conversation is about, the allocation of resources, and the delivery system and bureaucracy." Systems change also requires revamping the "reinforcement system"—change the "political, social, and economic feedback loops" to sustain these gains. If they hope to facilitate such a transformation, philanthropists need to engage in an "intentional discussion" about when to provide long-term funding and how to ensure that it succeeds.

The Annie E. Casey Foundation initiated such an inquiry after realizing that it was unclear whether two generations of comprehensive community initiatives had yielded systems change, and even whether "any particular innovation . . . had become standard practice," says Ralph Smith, senior vice president. Casey responded by trying "to be relentless about results." However, as with the UHI, the foundation discovered that the data systems needed to track results do not exist. Casey has since tried to foster a belief in measurable social change and build the capacity of local leaders "to ask the results question."

Core Lessons for Local Strategizing

Systems change requires a long-term commitment partly because a natural coalition of allies championing it rarely exists. "Public power holders and private stakeholders are seldom willing to invest political capital in forcing principled, coherent visions on disorderly, disconnected" service delivery that add up to real systems change, says Larry Brown, a professor at the Mailman School of Public Health at Columbia University and the seminar's third presenter (4). Officeholders, in particular, know they will not "get the gratitude of the electorate compared with the effort entailed in enacting systems change." Even when individuals and organizations vow to pursue large-scale policy reform, he points out, they often "smile for the group picture" and "then at the end of the day go off and do what's really important to them, which is something completely different."

Advocates must create a constituency for systems change. Reformers can do so by supplying "a strategic answer to a problem to which policymakers are actively demanding answers," or by persuading policymakers that "they face a serious problem to which they (the reformers) have a practical answer," says Brown (4). To build a constituency for systems change, reformers need to canvass "lots of political space," including state officials, city hall, the mayor's office, the bureaucracy, citywide organizations such as the Chamber of Commerce, and grassroots groups. Indeed, "the job of finding a constituency for large-scale social change is never done."

Philadelphia Councilwoman Blondell Reynolds Brown concurs that advocates must "build a network of believers" because there is "no reason for consensus" on systems change. She suggests identifying several people in each electoral district to convey advocates' message to elected officials, as they are more inclined to respond to their own constituents. Advocates also need to engage "possibility thinkers"—or key champions—to solidify support for systems change, she says. For example, when Philadelphia Safe and Sound initiated the Children's Investment Strategy, it enlisted Mayor John Street as a key ally, who in turn brought other leaders from government, philanthropy, and business on board.

Repetition breeds learning. Advocates must continually convey their messages on the need for systems change, says the councilwoman. When Philadelphia Safe and Sound asked the state to fund an expansion of the city's Youth Violence Reduction Partnership, for example, state officials "had to hear repeatedly from a number of different worlds . . . that that would be the right thing to do." Proponents of large-scale change also need to "meet officeholders at the door"—early in their tenure, or even before they win election—"as they don't like surprises." Toward that end, Philadelphia Safe and Sound is now crafting a message for the next mayoral campaign, planning to engage all the candidates and work with "people in their worlds" to ensure sustained public investment in children's health and safety.

Politically driven change and data-driven change are interdependent, not antithetical. Politicians need and want to look at concrete information, Professor Brown maintains. However, data are not "intrinsically useful;" they become so when "someone with power finds them, or is persuaded to find them, useful." Change agents must therefore turn information into "tangible documents that tell the story" and use them as "leverage and ammunition," says Councilwoman Brown. For example, Philadelphia Safe and Sound created the annual Children's Budget and Report Card, which maps services and outcomes for kids, and thus "puts council members on the spot for making decisions" to expand those services. The budget and report card convinced the City Council to fund 35,000 new after-school slots, according to Brown, with the result that fewer youth now end up in principals' offices and family court.

Grassroots power is essential to social change. Building a coalition to promote systems change is difficult "when an important part of the constituency"—poor and working-class people—lack "an independent voice," asserts Deepak Bhargava, director of the Center

for Community Change. Bhargava differentiates between the approaches taken by typical grassroots community organizations and comprehensive community initiatives. The former relies on conflict and confrontation to "reveal inequalities in income and resources," as the goal is "to move the needle on power rather than services." The latter, in contrast, tends to work within the existing power structure. Community organizations are also more responsive to their constituents, he says, because they rely heavily on members' dues, while community change initiatives often coalesce around outside funding. Grassroots community organizations are critical, according to Bhargava, because millions of people have provided the ideas, muscle, and moral center of every "big social change in this country."

Some organizations combine work in both spheres—"the streets and the suites," in the words of one seminar participant. For example, Baltimore Safe and Sound, the UHI affiliate, aimed to strengthen a democratic community voice through events such as a Youth Summit, which convened 7,000 city residents to vote on their priorities for children, while also working with elected officials to win support for youth programs.

However, any community change initiative hoping to tap grassroots power must produce concrete results, as community groups "have short time horizons" and have "seen it all before," cautions George Latimer, former mayor of St. Paul. "Pragmatism mobilizes people around an objective. If they experience incremental success, people "start acting as though what they say matters."

Core Lessons for Research and Evaluation

Gauging the effectiveness of large-scale initiatives is difficult because such efforts target numerous social sectors and outcomes, according to Melvin Mark, professor of psychology at Pennsylvania State University and president-elect of the American Evaluation Association (2). Analysts at the Aspen Institute have proposed basing evaluations of such initiatives on their theory of change—the "set of dominoes" that produces the desired outcomes after initial changes set in motion cascading impacts. However, critics have noted that even if an evaluation shows that changes targeted by an initiative have occurred and also uncovers positive outcomes, such an evaluation would not prove cause and effect, as forces beyond the initiative could be at work. To truly assess the initiative's effects, evaluators need to establish an experimental design whereby sites are compared to cities that resemble them in every way except for the work of the change agents—a nearly impossible task. However, a quasi-experimental design approach used by the UHI identified several comparison cities and provided some useful lessons for researchers interested in assessing impact.

The national UHI evaluation team selected a control group of cities that closely resemble UHI cities on six demographic characteristics. Metropolitan health and safety measures, survey responses, and interviews with key informants confirmed that conditions for youth match far more closely in those two groups of cities than in the rest of urban America, and thus that the evaluation would provide useful information.

To measure the impact of a large-scale initiative, evaluators need to both test its theory of change and compare outcomes with those in similar cities. Once the national evaluation team developed a program theory based on their understanding of the initiative's goals and objectives, the team then homed in on three central questions. "Can a foundation-sponsored initiative serve as a catalyst for a cross-sector collaborative process? Does such a process result in meaningful changes in policies and programs?…. And to what extent do such changes improve the health and safety of children and youth?" To answer those questions, the evaluation team "used two points of comparison: program theory to program experience, and UHI cities to comparison cities," according to Beth Weitzman, head of the team and a professor at New York University's Wagner School of Public Service, and colleagues (3).

The UHI national evaluation has "the best comparison design" among community change initiatives, maintains Hans Bos, president of Berkeley Policy Associates. However, that approach is "gruelingly expensive," he points out. What's more, even if based on a sophisticated design, the findings remain "incredibly specific" to those cities. Evaluators must work with funding authorities and key decision makers to decide how best to extrapolate the findings to other venues and future undertakings.

Expecting evaluators of a community change initiative to perform several roles can muddy the waters. Funders often ask evaluators to provide technical assistance and monitor participating sites as well as track an initiative's outcomes. But those roles may conflict, as they can compromise evaluators' objectivity and discourage sites from asking for help for fear that they will lose funding. Indeed, the project director for the national UHI evaluation attests that keeping its roles clear has been "a difficult dance." However, she points out, "our independence from the National Program Office and the foundation allowed us to get information" that sites otherwise would not have shared.

In the case of the UHI, local evaluation teams provided much of the initiative's technical assistance and also acted as coaches, helping sites elucidate their theory of change and the resulting political strategy. According to Eric Bruns, a professor at the University of Washington School of Medicine, local evaluators—like the evaluation team—must carefully consider whether site activities actually cause the measured outcomes.

Because of time and funding constraints, evaluations of large-scale initiatives may not capture some long-term impacts. Many evaluators are funded to perform a process and/or summative evaluation, which often concludes shortly after an initiative has run its course. Evaluators often therefore focus on intermediate rather than long-term outcomes. In the case of children's health and safety, for example, such intermediate measures can include changes in the number of school suspensions or rates of sexual activity among teens, rather than graduation rates or incidences of sexually transmitted diseases—outcomes that might take months or even years to be realized. While such "proxy measures" can prove highly useful, says Bos, because program theories linking intermediate and long-term impacts "tend to be very strong," there is always the danger that even the most rigorous and well-run evaluation will miss important program effects that take time to transpire.

Evaluations are effective if their implications are clear and they help empower boards to make decisions. The vice president of a major foundation recalls that an evaluation of one community health care initiative was "viciously negative." Yet despite its tone, the board liked the evaluation because it was decisive, offered reasons for its findings, and represented a consensus among participants in the initiative. Thus the evaluation "pushed the foundation in new directions."

Yet even the best initiatives often exert only modest impacts on measurable outcomes, cautions Larry Brown, and "only people who are open to learning are going to learn" from their results. Still, evaluations can "raise the quality of the debate, particularly for people with open minds"—by providing feedback that allows decision makers to make timely and informed changes in an initiative, and by shedding light on which approaches to social change can improve people's lives.

Lessons from the Field: Reflections with UHI Site Directors

In a final session, leaders from the UHI sites, joined by other seminar participants, cited the overall lessons they have learned during the past decade:

Advocates must take the lead in compiling the information essential to effective decision making and public accountability. Data are the "great leveler"—they "neutralize biases and politics" and "bring people together who lack common interests," attests JoAnn Lawer, executive director of Philadelphia Safe and Sound. People are now demanding information such as the Children's Report Card and Budget, and those tools have enabled advocates to move "hundreds of thousands of dollars in support of tens of thousands of kids…. Data will always be our bible." The early efforts of Youth Matters,

Richmond's UHI affiliate, to compile data-based best practices in services for children not only supported its case for systems change but also helped give the organization credibility, attests Lynn McCashin, executive director.

Race plays a central role in large-scale social change. According to Hathaway Ferebee of Baltimore Safe and Sound, cross-class and cross-race coalitions can produce systems change. Because "the very poorest Americans . . . are facing more extreme versions of the circumstances that face the bottom 40 percent of the country," advocates can "reach across city/suburban lines, across class lines, across color lines," Barghava agrees. Grenae Dudley, director of Mayor's Time, Detroit's UHI affiliate, attests that change agents need to walk a thin line between championing issues that seek to benefit a disenfranchised racial or ethnic group and capturing the support of others. For example, she says, "We had to make after-school more than just an inner-city issue…. we made it a bedroom-community issue as well."

Advocates need to show a return on social investment. The public may not believe that some investments in children and other underserved constituents will pay off, so advocates need to shift expectations. For example, the government officials participating in Oakland's UHI affiliate realized that "we had enough resources to do a better job" of serving kids, according to the health care director for Alameda County. "If we could show the public we could spend our money better, we could seek ways to get more." Thus the coalition targeted the 10 percent of kids who "commit most of the crimes" in six schools with the highest suspension rates. "We started making a difference, and all of a sudden people started talking about (effective) models." The model that targets the most problematic kids has expanded to 37 schools in Oakland as well as high-need schools throughout Alameda County. "Now we are speaking for a larger constituency," he says.

Getting to scale may entail depth rather than breadth. Advocates may want to initially target high-risk populations rather than trying to broaden their reach to the largest-possible number of people. As in Oakland, for example, Baltimore UHI leaders decided to focus on the needs of 100 of the 400 highest-risk youth in the city before they ended in the criminal justice system. The state has since agreed to return a significant percentage of the funds it no longer spends on custodial services for youth to the community. Such a target approach yielded dividends thereby enabling change agents to redirect funds to other programs likely to benefit disadvantaged youth such as job creation. In seeking to improve the conditions for children and families advocates "should be intentional," Ferebee holds—that is, aim for large-scale systems change.

Systems change requires alliances with both likely and unlikely partners, and knowing who has the authority to implement change. Advocates of large-scale change must attract "the usual suspects to the table"—the political elite—because a lack of buy-in or awareness on their part may "unseat your initiatives," says Dudley of Detroit's Mayor's Time. However, advocates must also enlist nontraditional partners, including those below the top rung of the bureaucratic ladder, such as teachers, parents, clinical social workers, and case managers. Dudley found that if her organization could leverage resources to deal with the "points of pain" of these potential allies, they would "carry the water" for advocates' larger goals.

A successful community change initiative incubates dynamic leaders. Social change occurs when thoughtful, charismatic, committed people "firing on all fronts open doors and ears and cajole people to listen," according to one participant. Large-scale initiatives must therefore encourage members of the community to learn "how to get things done in the political arena." However, change agents "need a more mindful way of teaching people to become political," conferees maintain.

Securing systems change takes longer than 10 years. A decade is "no time at all" in the public realm, and reformers must be "realistic about time and space—10 years is plenty of time for all plans to be deinstitutionalized," participants counsel. One reason is that the United States lacks a social structure that accepts collective responsibility for kids. Systems change therefore entails tackling racism, poverty, income insecurity, and lack of access to health care and other services.

References

Papers cited in this policy brief and commissioned for this seminar are available online at www.ksg.harvard.edu/urban poverty:

1. Prudence Brown, Harold Richman, and Joshua Weber. "The Urban Health Initiative: Lessons for Philanthropy."
2. Melvin H. Mark. "Challenges in Evaluating Community Change Initiatives."
3. Beth C. Weitzman, Diana Silver, and Keri-Nicole Dillman, "Integrating a Comparison Group Design into a Theory of Change Evaluation: The Case of the Urban Health Initiative," *American Journal of Evaluation* 23, 4 (2002), pp. 371–385.
4. Larry D. Brown. "Constituencies and Connections: The Politics of System Change in the Urban Health Initiative."

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*The mission of the **Urban Health Initiative (UHI)** is to improve the health and safety of children and youth. Local campaigns in Baltimore, Detroit, Oakland, Philadelphia and Richmond participating in the UHI seek to change the major systems that serve children in order to improve youth and safety statistics throughout the entire city or metropolitan area. The UHI National Program Office is located at the University of Washington and is headed by former Seattle Mayor Charles Royer.*

*The **Urban Seminar Series on Children's Health and Safety** brings together researchers, practitioners, and policy makers who have a common interest in improving the health and well being of urban children. The series is sponsored by The Robert Wood Johnson Foundation (RWJF) and directed by William Julius Wilson at Harvard University's John F. Kennedy School of Government. The seminars are designed to complement RWJF's Urban Health Initiative.*

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