

RISE AGAINST HATE

PERMIT-TO-CARRY APPLICATION OUTCOMES IN NEW JERSEY: A COUNTY-LEVEL ANALYSIS (2019–2024)



Our published dataset used in this study is available at Harvard University: Permit-to-Carry Application Outcomes in New Jersey: A County-Level Analysis (2019–2024), <https://doi.org/10.7910/DVN/FOJQMP>, Harvard Dataverse, V1.

Authors and Contributors:

Benjamin Shore; American University; B.S.B.A.; Baltimore School of Law; Juris Doctor Candidate

Manaar Salama; University of California, Berkeley; B.A. Data Science

Ellie Yang; Emory University; B.S. Quantitative Sciences & Psychology

Danial Mustafa; Rutgers University-New Brunswick; B.S. Computer Science & Data Science

Lexi Lay; Wake Forest University; B.A. Politics & International Affairs; Emory University; MM; Business Management

Clara Artley; University of Michigan; B.A Political Science & B.A Spanish Language

Karla Mellul; Kohelet Yeshiva High School

OVERVIEW

This investigative study examines New Jersey's permit to carry process following the Supreme Court rulings in New York State Rifle & Pistol Association, Inc. v. Bruen in 2022. This study identifies alarming racial disparities with respect to the process for approving the permit to carry applications. We uncovered significant findings, such as the statistical fact that Black individuals are 52.6 times more likely to be denied a permit compared to their White counterparts when adjusted for population size in Ocean County. **Across the state, Black individuals are 10.38 times more likely to be denied a permit compared to their White counterparts when adjusted for population size.** Additionally, after performing a chi-square test, the data reveals that there is a statistically significant relationship between race/ethnicity and application denial percentages. The findings from this study indicate that Black individuals are facing considerable racial-based barriers when applying for a permit to carry. Based on these results, an important next step towards equality for individuals of all races and ethnicities in their permit to carry applications would be instituting clear definitions within a more standardized application review process.

INTRODUCTION

An earlier report investigated by John Petrolino and published on Bearing Arms underscored significant racial disparities in New Jersey's permit to carry applications, revealing that Black applicants were denied double the rate of White applicants.¹ This investigation led us to further investigate data on permits to carry handgun applications from the New Jersey Office of Attorney General, which is the most comprehensive permit to carry data set available today and provides information on the general application and applicant details. Reporting this anonymized data, which includes applications from December 1, 2019 to the present date, became a requirement of law enforcement agencies by the Attorney General Directive 2023-02.² Due to the implementation of this directive, the anonymized and aggregated data for these applications is publicly available for analysis. Although the information of an individual application and applicant is not provided, the general demographic, geographic, and causal factors of applications' approvals and denials can be observed. Although this data is published publicly as a raw comma-separated value file ready for analysis, it was discovered that, due to the deanonymization process of the data, the application data with approval and denial counts aggregated by race/ethnicity was not made publicly available by the state.

For this reason, a dataset for each county and for the entire state of New Jersey was manually created for this study, pooling information from the individual counties' pages on the Application Details tab of the Tableau dashboard provided by the NJ Office of Data instead. This data was collected by the team on August 17, 2024, and as such, the results obtained in this study only contain application data from December 1, 2019 to August 17, 2024. The manually created dataset is publicly available with the publishing of this study, and it contains data on county name, race/ethnicity, whether the application was approved or denied, the denial reason if denied, and how many individuals are contained within each category. For the purposes of this study, the manually created dataset only includes individuals within the Black, White, and Hispanic race/ethnicity categories; individuals within other categories, such as Asian/Pacific Islander, were not considered for this study. Additionally, the Hispanic category within our dataset contains individuals who identified as Hispanic or White with Hispanic/Spanish Origins. The data includes individuals of all ages and genders, as the primary interest in analyzing disparities was within the race/ethnicity category. An important reporting issue to note is that, within the Tableau dashboard from the NJ Office of Data, there were occasional inconsistencies regarding the number of application denials and how many denial reasons were reported, and it was possible for an individual to be denied for multiple reasons. Because of this, the data for this study included an additional denial reason of "Unknown," in the rare occurrences where there was an insufficient number of denial reasons for a corresponding number of denials. An important historical landmark to consider with this study is the Supreme Court's New York State Rifle & Pistol Association, Inc. v. Bruen decision in 2022. The decision, which reinforced that an individual's right to carry a gun in public for self-defense is protected by the Second Amendment, affected several other processes and laws within individual states.

One of these processes was New Jersey's permitting procedure: prior to the Bruen decision, New Jersey had one of the strictest permit processes across the country, requiring a justifiable "proper cause" for an individual to carry a handgun in public (also known as "may-issue" permitting, in which an applicant is not guaranteed approval if they meet all of the criteria).

[1] John Petrolino, "Black Applicants for N.J. Permits to Carry Denied More than Double Whites," bearingarms.com, May 4, 2024, <https://bearingarms.com/john-petrolino/2024/05/04/Black-applicants-for-nj-permits-to-carry-denied-more-than-double-Whites-n1224780>.

[2] "Permit to Carry Dashboard," New Jersey Office of Data, accessed September 27, 2024, <https://public.tableau.com/app/profile/nj.office.of.justice.data/viz/PermittoCarryDashboard/Intro>.

After Bruen, which deemed New Jersey's permit process unconstitutional, the process evolved to follow the standards of "shall-issue" permitting, in which an individual should be guaranteed approval to carry their handgun, provided they meet all objective³ criteria. As specified in Footnote 9 of Bruen, the licensing criteria must follow "clear, uniformly objective standards" that are consistent all across applicants in order to avoid subjective discretion at the hands of authorities, resulting in avoidance of potential biases. Something to note about the reviewers of the applications is that prior to December 22, 2022, decisions were made by the court, but all decisions afterwards could be made by the "issuing authority pursuant to the new law," which is made up primarily of assessors within the police department.

Based on this information, one would expect the permit applications, as well as the permit approvals, to increase significantly post-Bruen. One might also expect a more equal distribution of approvals and denials across individuals of different demographics and backgrounds, provided they all meet the basic requirements for the permit. Thus, the goal of this study is to investigate the distribution of approvals and denials across different races/ethnicities and counties, as well as to discover which denial reasons are the most common. Upon initial observations of the data, the primary concern for biased or potentially prejudiced results is with the denial category of "Public Health, Safety, and Welfare," as the reasoning from this category is based on the subjective discretion of the application investigator within the police department. The stated reason for the denial is that "the person is found to be lacking the essential character of temperament necessary to be entrusted with a firearm."⁴ This denial reason refers to the applicant's "essential character of temperament" or "good character" or lack thereof with regards to gun ownership and considers whether granting the individual a permit to carry would or would not be in the best interest of public safety.⁵ Footnote 9 of Bruen specifies that licensing criteria must be objective across all applicants, however, some New Jersey police departments admit that "good character" is a "subjective standard."⁶ The standards illustrate the level of subjectivity that is up to the discretion of the police, which leaves room for bias and personal judgements to affect these subjective standards.

[3] Rachel Weiner, "The Supreme Court upended gun laws nationwide. Mass confusion has followed," The Washington Post, July 7, 2024, <https://www.washingtonpost.com/dc-md-va/2024/07/07/gun-laws-supreme-court-bruen-rahimi>.

[4] New Jersey Revised Statutes § 2C:58-3 (2022), <https://law.justia.com/codes/new-jersey/2022/title-2c/section-2c-58-3/>.

[5] "Gun Permit Applications and Appeals," Helmer, Conley & Kasselmann, PA, accessed September 27, 2024, <https://www.helmerlegal.com/practices/criminal-law/weapons-offenses/gun-permit-applications-and-appeals>.

[6] Burlington Township Police Department. Permit to Carry a Handgun: Application Instructions. Burlington Township Police Department, 2023. <https://burlingtonpolice.com/wp-content/uploads/2023/07/PERMIT-TO-CARRY-INSTRUCT-2.pdf>.

An important consideration with respect to application denials is that in the state of New Jersey, the same criteria are held for firearm identification applications as for the permit to carry applications, and an individual can only apply for a permit to carry a handgun after they have been approved for a firearm identification. As such, an interesting question to contemplate while considering the results of the data analysis is: why were certain individuals denied a permit to carry, particularly for the reason of Public Health, Safety, and Welfare, if they had already met the states standard when they had previously applied for a firearm identification card which has the same application criteria for a permit to carry. An example that depicts the severity of this question is Dr. Martin Luther King Jr.'s own experience with applying for a permit to carry. In 1956, after his house was fire-bombed, Dr. King applied to the local sheriff for a permit to carry a concealed handgun. He was denied on the grounds that he was "unsuitable."⁷

Public Health, Safety, and Welfare is a denial category researched further in the study, and the percentage differences in denial rates for Black people in contrast to their White counterparts is striking due to the discretion likely present within the evaluation system for a permit to carry. Black and Hispanic individuals are denied at rates equal to or even surpassing those of White individuals, who make up a substantially larger percentage of the population. As such, a total of 90 Black and Hispanic individuals were denied for the reason of threatening Public Health, Safety, and Welfare, compared to 45 White individuals, indicating an alarming racial disparity as White individuals are the majority population in most counties.

[7] James Peterson, "MLK's relationship with guns was more complicated than you'd expect," *The Philadelphia Citizen*, January 17, 2022, <https://thephiladelphiacitizen.org/between-king-guns/>.

RACIAL DISPARITIES IN PERMIT DENIALS: A FOCUS ON BLACK AND WHITE APPLICANTS

In New Jersey, significant racial disparities were identified in the denial of permit to carry applications. Although Black individuals make up a smaller percentage of the population compared to White individuals, **the normalized denial rates and disproportionate denial ratios reveal that Black individuals are disproportionately denied permits across New Jersey.**

To assess whether Black individuals are disproportionately denied permits to carry compared to White individuals in New Jersey, we calculated the Normalized Denial Rate for each racial group across counties. Normalizing the data was essential due to the significant population size differences between Black and White residents in the state, with the White population far outnumbering the Black population. By normalizing the data based on population sizes, we ensured that the differences we observed were not simply due to the fact that there are fewer Black individuals applying but rather a reflection of unequal treatment in the application process.

METHODS

1. Denial Rate Calculation:

- a. For each race (Black and White), we first calculated the denial rate in each county by dividing the number of denied applications by the total number of applications for that race.

$$\text{Denial Rate} = \frac{\text{Number of Denied Applications}}{\text{Total Number of Applications}}$$

2. Normalized Denial Rates:

- a. Since the population sizes of Black and White individuals differ significantly, we normalized the denial rates by accounting for the population percentage of each race in the county. The normalized rate provides an adjusted measure, helping us compare denials fairly across races:

$$\text{Normalized Denial Rate} = \frac{\text{Denial Rate}}{\text{Population Percentage of Race in County}}$$

3. Disproportionate Denial Ratio:

- a. To compare the normalized denial rates between Black and White individuals, we calculated the disproportionate denial ratio:

$$\text{Disproportionate Ratio} = \frac{\text{Normalized Denial Rate for Black Individuals}}{\text{Normalized Denial Rate for White Individuals}}$$

- b. A ratio around 1 would indicate that denial rates for Black and White individuals are proportional to their population sizes. Ratios significantly higher than 1 suggest that Black individuals are denied at disproportionately higher rates compared to White individuals.

HIGHLIGHT OF FINDINGS

Our findings clearly show that Black individuals are disproportionately denied permit to carry applications relative to their population size, with disproportionate ratios far exceeding 1 in many counties. This indicates a systemic disparity that could be indicative of racial bias in the permit approval process across New Jersey. For example, Black people in Ocean County face a disproportionate denial ratio of 52.6, despite being a much smaller population than White people. This means that Black individuals are 52.6 times more likely to be denied a permit compared to their White counterparts when adjusted for population size. Similar trends are observed in Gloucester County and Cumberland County, with Black applicants being 35.98 and 22.2 times more likely to be denied, respectively. This indicates that Black individuals are facing systematic barriers based on race when applying for permits, well beyond what would be expected based solely on population differences.

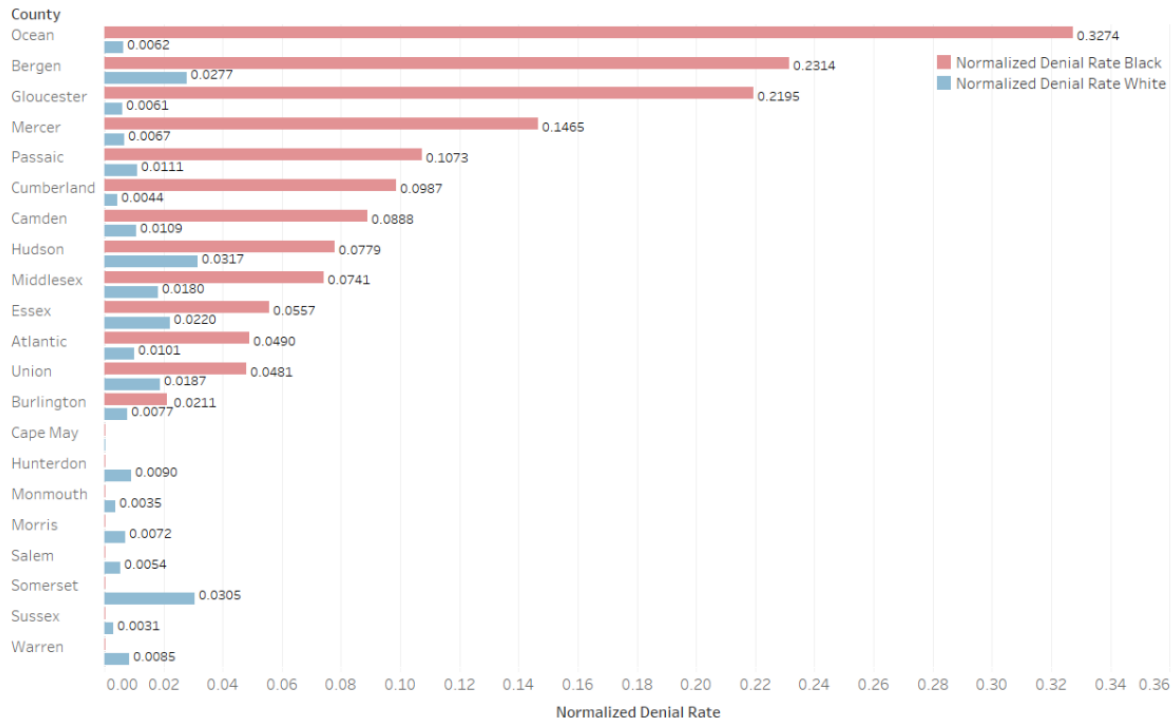
In other counties like Atlantic and Middlesex, Black individuals are 4.87 and 4.12 times more likely to be denied than White individuals, showing that this pattern of racial disparity is widespread across various counties, even when the disproportionate ratio is not as extreme as in Ocean County.

Overall, the data demonstrates that even though Black individuals represent a smaller fraction of the population, they are denied permits to carry firearms at far higher rates than White individuals across New Jersey. These findings point to potential systemic issues in the permit approval process that disproportionately affect Black individuals, warranting further investigation and reforms to address these racial disparities.

Disproportionate denial ratio for Black people in each county:

Monmouth: 0	Bergen: 8.35	Hunterdon: 0	Sussex: 0
Middlesex: 4.12	Burlington: 2.76	Cumberland: 22.20	Somerset: 0
Morris: 0	Camden: 8.16	Essex: 2.53	Salem: 0
Ocean: 52.60	Cape May: NA	Gloucester: 35.98	Outside NJ: NA
Passaic: 9.69	Warren: 0	Hudson: 2.46	Mercer: 21.94
Hunterdon: 0	Union: 2.57	Atlantic: 4.87	

This chart compares the normalized denial rates for Black and White individuals across New Jersey counties:

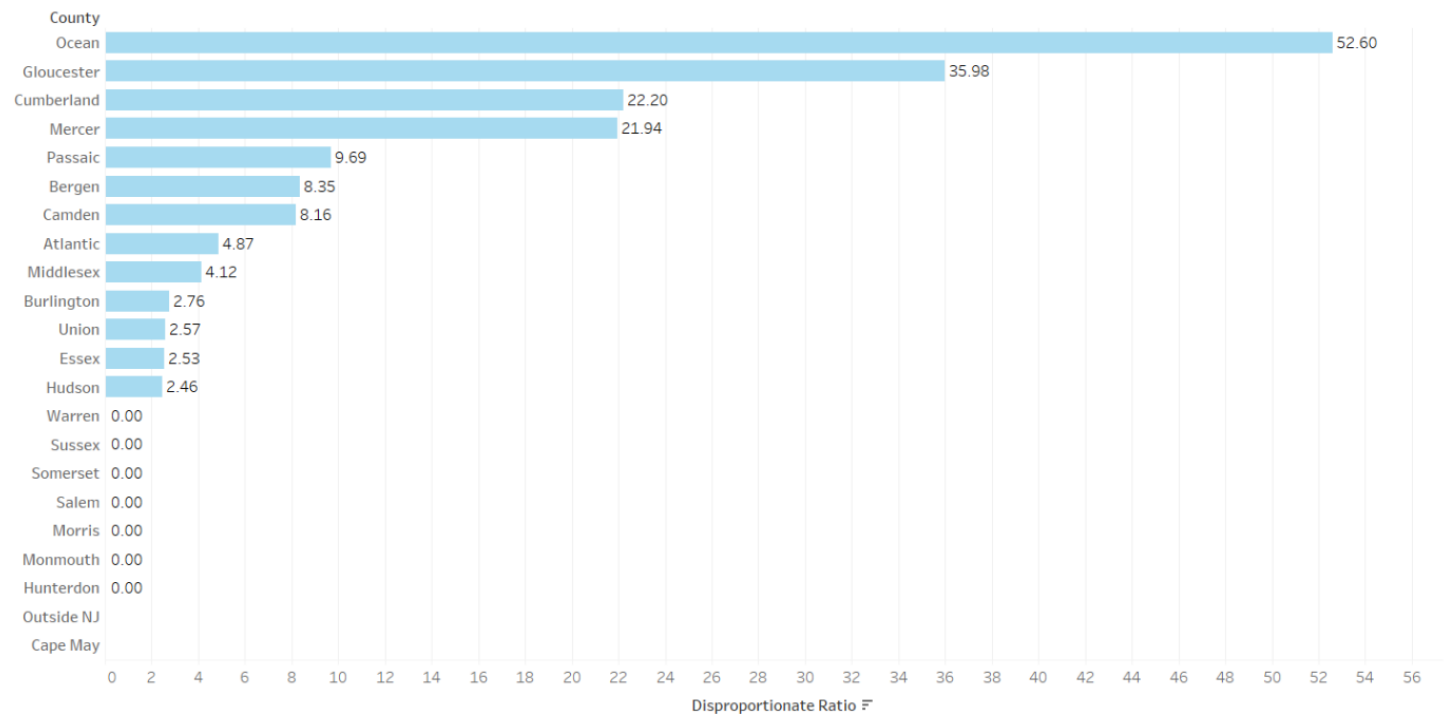


Highlighted in the graph, Normalized Denial Rates of Black applicants are disproportionately affected by application denials in comparison to White individuals in nearly half of the counties in New Jersey, illustrating a systematic issue. Strikingly, Black individuals have a 0.3274 denial rate in Ocean County in contrast to White individuals with a 0.0062 denial rate, resulting in Black individuals being 52.6x more likely to get denied over application submissions. To expand, Ocean County's Black (Non-Hispanic) population only comprises "2.84% of the population"⁸ in Ocean County where they are only the third largest ethnicity/racial group, whereas, the White (Non-Hispanic) population is the largest ethnic/racial group with "83.1% of the population". Therefore, with Black individual applicant denial rates being strikingly more disproportionate than their White counterparts, despite having a 1:29 ratio showcases an underlying racial bias embedded in the system and underscoring racial barriers that disproportionately disadvantage the Black individuals in the community.

[8] "Ocean County, NJ." Data USA, datausa.io/profile/geo/ocean-county-nj. Accessed 12 Nov. 2024.

CHARTS

Disproportionate Denial Ratios for Black vs White by County



This chart above shows the disproportionate denial ratios for Black vs. White individuals across New Jersey counties.

Mirrored in the graph above, disproportionate denial rates show how racial disparities have been a pivotal factor for permit-to-carry applications for Black individuals all across counties in New Jersey. For instance, Ocean County has the most extreme disparity in New Jersey, where Black people are 52.60 times more likely to get denied when compared to White individuals. Similarly, Gloucester and Cumberland countries are followed with high denial rates of 35.98 and 22.20. Conversely, counties such as Warren and Sussex have zero disproportionate denial rates. According to the U.S. Census, all these counties have “predominantly, White populations with the exceptions of Camden, Essex, and Salem”. In contrast, Ocean County, Gloucester, and Cumberland have Black populations comprising less than “10% of their respective population”, which can seemingly be reflected in their strikingly high disproportionate denial rates. Therefore, this data underscores how racial disparities is a systemic issue in the application process as implicit and racial biases are established in specific counties.

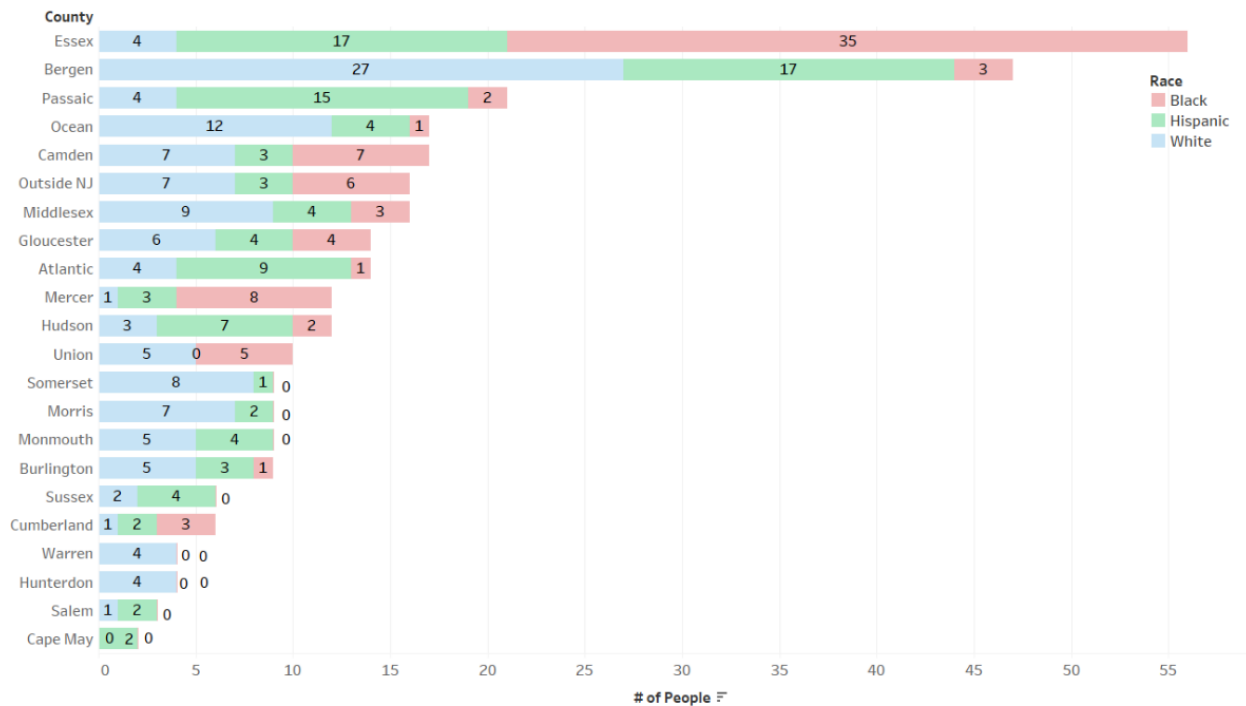
[9] “U.S. Census Bureau Quickfacts,” Ocean Township (Ocean County), New Jersey QuickFacts from the US Census Bureau, accessed November 21, 2024,

<https://www.census.gov/quickfacts/fact/table/oceancountynewjersey/PST045223>.

[10] “U.S. Census Bureau Quickfacts: Gloucester City City, New Jersey,” U.S. Census Bureau QuickFacts: Gloucester City City New Jersey, accessed November 21, 2024,

<https://www.census.gov/quickfacts/fact/table/gloucestercitycitynewjersey/PST045222>.

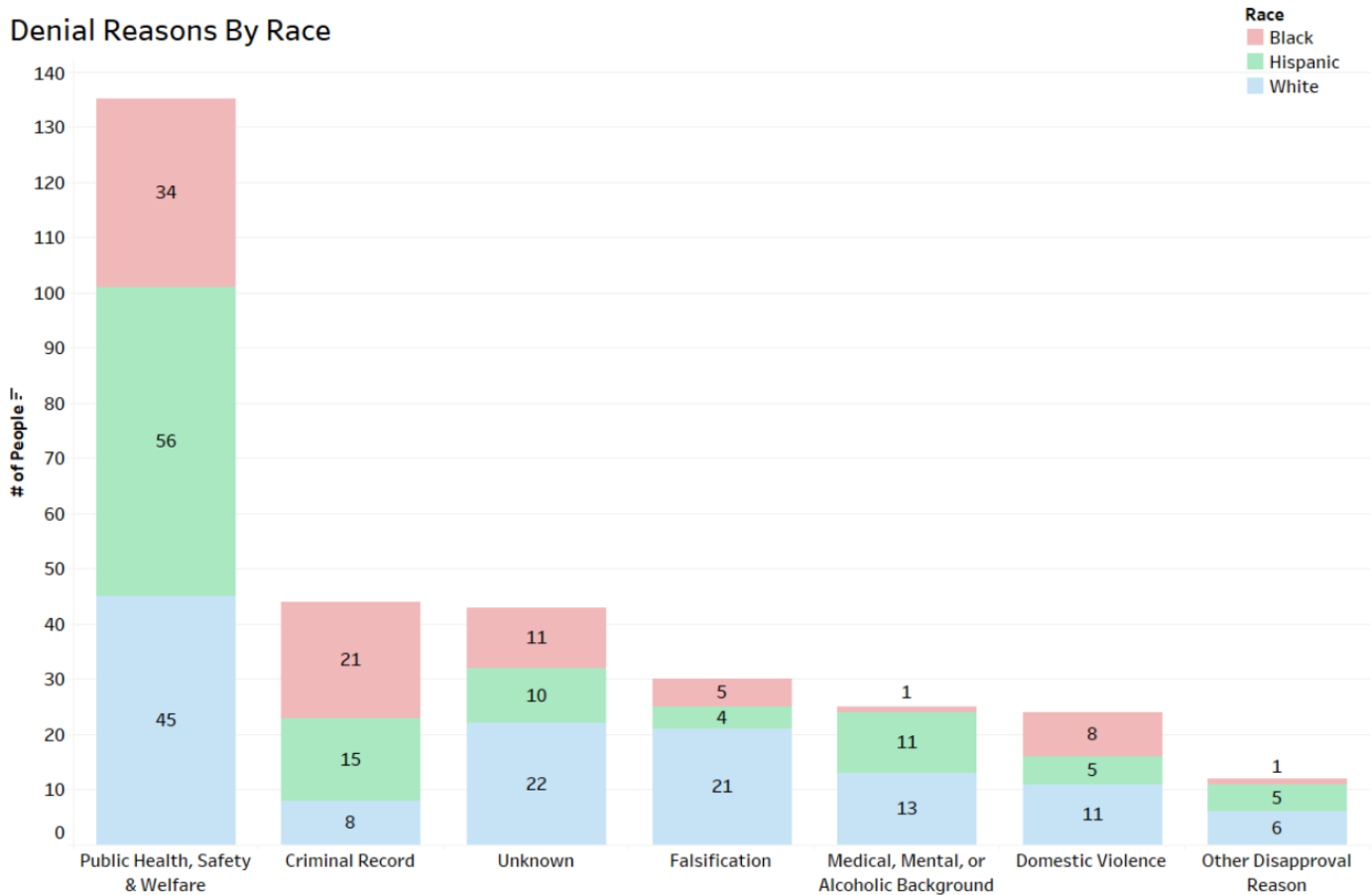
Race vs County (Denials)



Graph description: The graph shown above shows the number of denials of each race across New Jersey counties.

The graph highlights significant racial disparities, particularly affecting Black individuals. In Essex County, Black individuals face the highest denial rates, far surpassing those for White and Hispanic individuals, indicating a pronounced racial disparity. Similar patterns are observed in Mercer, where Black denials outpace those of other racial groups, showing particularly large gaps between Black and White denials. In Camden, the denial rates for Black individuals closely approach those for White individuals, despite likely differences in population sizes, reinforcing the systemic nature of the issue. In Atlantic, Bergen and Hudson, the denial rates for Hispanic individuals are more comparable to those for Black individuals, suggesting that racial disparities extend beyond just Black-and-White comparisons in certain counties. Meanwhile, counties like Salem, Hunterdon, and Cape May show lower overall denial numbers, with White and Hispanic individuals representing most denials. Across the board, Black and Hispanic individuals are disproportionately denied permits compared to their White counterparts, with Essex, Bergen, and Passaic leading in these disparities. These trends shown through data suggest the presence of systemic racial biases that lead to disparities in the permit approval process, calling for further investigation into the factors contributing to these outcomes.

DENIAL REASONS BY RACE



Graph description: This graph illustrates the breakdown of denial reasons for permit applications across three racial groups: Black, Hispanic, and White.

The most common reason for denial across all groups is Public Health, Safety, and Welfare, with 34 Black, 56 Hispanic, and 45 White individuals denied for this reason. Among Black and Hispanic individuals, Criminal Record is the second most frequent denial reason, affecting 21 Black and 15 Hispanic applicants, while White individuals more frequently face denials due to Unknown reasons (21 applicants). Domestic Violence and Falsification are less common reasons for denial but appear across all racial groups.

When considering the lower population proportion of Black and Hispanic individuals across all counties, the overrepresentation of these groups in certain denial categories, such as Criminal Record and Public Health, Safety, and Welfare, becomes even more striking. Despite making up a smaller percentage of the population, Black and Hispanic individuals are denied at rates comparable to or even exceeding those of White individuals, who represent a much larger portion of the population.

For example, 34 Black and 56 Hispanic individuals were denied for Public Health, Safety, and Welfare, compared to 45 White individuals, despite White individuals being the majority population in most counties. This suggests that Black and Hispanic individuals are disproportionately affected by these denials when their smaller population sizes are taken into account. Similarly, Black individuals are more frequently denied due to Criminal Records (21 individuals) compared to White applicants, despite the lower population of Black individuals, raising concerns about the consistency and fairness in the criteria being applied.

This analysis not only shows that public safety concerns dominate as the main reason for denial across all races, but also indicate that Black and Hispanic individuals are facing disproportionate barriers to obtaining permits, suggesting potential systemic biases in the permit review process. This disparity becomes more significant when we consider their much smaller population sizes in comparison to the White population.

CHI-SQUARE TEST FOR RACIAL DISPARITIES IN PERMIT APPROVALS

We conducted a chi-square test to investigate whether there is a significant relationship between race and the approval or denial of gun permit applications. The test allows us to determine if the observed differences in approval rates across racial groups are due to chance or if there is a statistically significant association

OBSERVED DATA

We collected data on permit approval statuses for three racial groups: Black, Hispanic, and White. The observed counts of approved and not approved permits for each group are as follows, where "True" represents approved permits and "False" represents not approved permits.

Race	Approved	Denied
Black	5,430	81
Hispanic	15,930	106
White	19,456	126

EXPECTED VALUES

The chi-square test calculates the expected approval and denial counts assuming no racial bias exists. These are compared to the observed values:

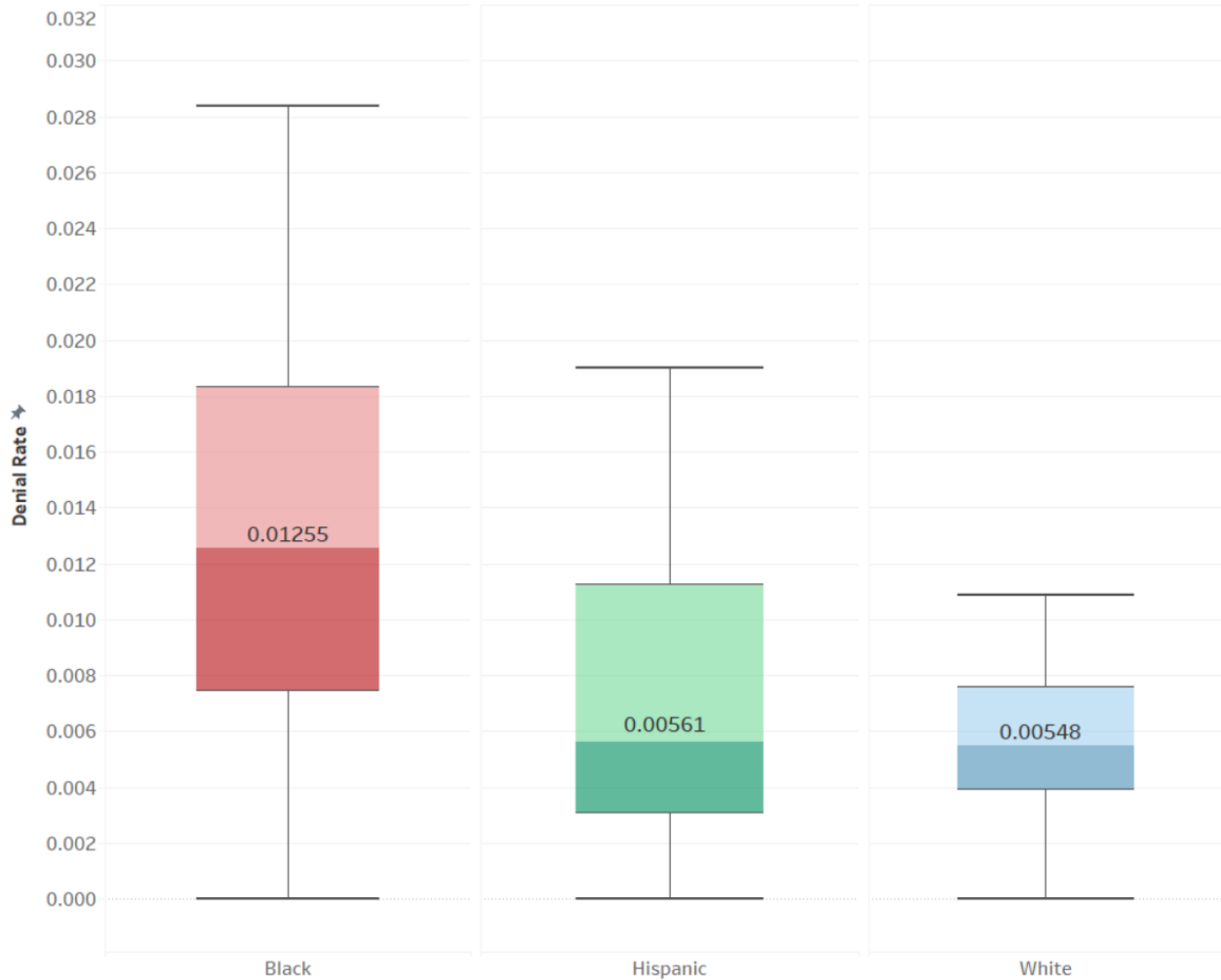
Race	Observed Approved	Observed Denied	Expected Approved	Expected Denied	Approved Difference
Black	5,430	81	5,469	42	-39
Hispanic	15,930	106	15,914	122	16
White	19,456	126	19,433	149	23

TEST RESULTS

The chi-square statistic of 42.37, with a p-value of 6.32e-10 and 2 degrees of freedom, indicates a strong relationship between race and approval rates. Since the p-value is far smaller than the common threshold of 0.05, it suggests that the differences in approval rates among racial groups are statistically significant. In other words, the variation in approval rates is unlikely due to random chance, and there is strong evidence that race may play a role in these differences. This means that the observed differences in approval rates between racial groups are meaningful and worth further exploration.

DENIAL PERCENTAGES FOR PERMIT TO CARRY APPLICATIONS BY RACE IN NEW JERSEY

In addition to the chi-square test, we visualized the denial percentages for gun permit applications across different racial groups using a box plot. This plot highlights the distribution of denial percentages for Black, Hispanic, and White applicants.



Graph Description: The above box plot shows the distribution of overall denial percentages for Black, Hispanic, and White individuals across all of New Jersey. The rate displayed in the box plots represents the median value of the denial rates.

Key observations reveal that Black applicants have the highest median denial percentage among the three racial groups, with a wider range of values, indicating greater variability in denial rates. Their upper bound extends farther than those of other groups, suggesting that Black applicants face more extreme denial percentages in some cases. For Hispanic applicants, the denial percentage is slightly lower than for Black applicants but still displays a broad range. This implies that while the majority of denial rates are lower, there remain instances where high denial percentages occur. White applicants, on the other hand, show the lowest median denial percentage, with a much narrower range of values. This reflects greater consistency in approval decisions and fewer extreme values compared to other groups. Overall, this visual evidence supports the chi-square findings, indicating that denial rates vary significantly by race, with Black applicants being more likely to face denial.

CONCLUSION

In this study, we investigated the New Jersey Permit to Carry process and found racial disparities within permit to carry applications across New Jersey. This is especially apparent following the 2022 Supreme Court Bruen decision which lifted gun restrictions across the United States, which should have allowed an equal, unbiased system of obtaining firearms. Our findings have concluded that there are major systemic issues where Black and Hispanic individuals are disproportionately being denied gun permits compared to White individuals, despite every applicant passing the same initial screening requirements for a Firearm ID Card ("FID"). With a p-value of $6.32e-10$, there is a very strong indication that race plays a significant factor in denial rates.

The patterns we've come across only highlight the broader, more pressing context of the racial inequalities Black and Hispanic individuals are facing daily. Despite already being vulnerable to housing, healthcare, and wage barriers, they now face additional injustice by being denied access to their protected self-defense rights. Our research has shown that Black people are statistically more likely to be denied compared to White individuals. In Atlantic, Gloucester, and Cumberland County we see how the normalized denial rates of Black individuals are 53.6, 35.98, and 22.2 times more likely to be denied than White individuals, indicating that there is widespread systemic bias across the state.

To address these issues would mean a thorough rethinking of the current policies for the gun permit application. Across multiple counties, racial disparity has been observed, especially in denials related to "Public Health, Safety, and Welfare." The criteria for this are unclear, allowing officers to interpret its meaning at their discretion. This introduces implicit biases or stereotyping, affecting the outcome of application decisions. Revising this with clearer guidelines would help enforce stricter accountability in the decision-making process, mitigate racial bias, and ensure police departments are held liable for their actions. Policymakers, law enforcement, and advocacy groups should take urgent action to investigate the issues listed above and enforce more equal application processes to ensure the fair treatment of all individuals, regardless of race or ethnicity. This issue is critical, not only for equal rights but also for the safety and well-being of communities across the state.

RECOMMENDATIONS

1. Increase transparency

- a. One of the main findings of this study is the concern for fairness and inconsistency in the criteria or guidelines applied for permit denials. It is recommended that New Jersey, and other states, develop a standardized, clear, and transparent set of criteria for permit approvals and denials. This would minimize the discretion of individual application reviewers and ensure that all applicants are evaluated based on the same set of objective criteria.
 - i. This could be done through developing clear and transparent guidelines, which would be published and used to approve or deny permits on a government website, ensuring applicants can access them easily.
- b. Given the significant number of denials under the category Unknown, it is crucial to increase transparency in the permit application review process. Applications should clearly document the specific reasons for denial, with regular audits conducted to ensure that racial bias is not influencing decision-making.
 - i. Governmental organizations could reduce the number of denials underneath the category unknown by using interactive elements to the permit application process, such as establishing a phone line available only for assisting applicants.
- c. The state should create clear and transparent standards for what types of criminal records are subject to denial and offer applicants to provide additional context (e.g., rehabilitation) in their application.

2. Address racial disparities

- a. Training: The data constantly shows that Black and Hispanic individual applicants are disproportionately denied permits relative to their population sizes. To address these disparities effectively, a multi-faceted approach must be implemented, such as the combination of policy reform, training, and community involvement. For example, there should be mandatory training programs on conscious/unconscious bias for all personnel involved in the review and approval process. The training should be conducted regularly (e.g., annually) and focus on recognizing and mitigating biases that might inadvertently affect their decision-making, particularly in cases involving race.

b. Diversify decision-making bodies: Ensure that the individuals who review and decide on permit applications reflect the racial diversity of the communities they serve. E.g., hiring more individuals from underrepresented racial and ethnic backgrounds for roles in the permit approval process to ensure broader perspectives and mitigate potential biases.

i. Furthermore, there should be a reduction in reviewer discretion, which could be done through structuring decision-making tools and processes along with a Double-Blind review process. The implementation of a standardized scoring system that reviewers must follow where criteria within the permit is given a specific weight and applicants are scored objectively would assist in this reduction.

ii. The Double-Blind review process would allow for multiple reviewers to be able to assess each application independently, reducing the level of bias and the influence of other reviewers.

3. Public Education

a. Many applicants, particularly from marginalized communities, may not be aware of their rights, how to navigate the permit process, or how to appeal if they are unfairly denied.

i. Offering free public educational sessions and workshops to help individuals understand their rights in the permit process and how to file appeals.

ii. Providing clear, accessible resources to people, such as flyers and online guides, detailing how to appeal a denial, what factors may impact permit approval, and who to contact for assistance. Distribute educational materials and hold town hall meetings to engage with the public.

b. Offering legal support to applicants who feel they have been unfairly denied, or an opportunity for denied applicants to see specific information as to where on their application they went amiss, versus only receiving a category that they did not qualify in.