LOCAL AND REGIONAL
GOVERNMENT ALLIANCE ON
RACE & EQUITY

Advancing Racial Equity

A Framework for Federal Agencies

by Anja Rudiger, Ph.D.

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forward

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ABOUT THE GOVERNMENT ALLIANCE ON RACE & EQUITY

The Government Alliance on Race and Equity (GARE) is a local, state, and regional government network with more than 400 members that works to advance racial justice and a strong multiracial democracy. GARE supports racial equity practitioners to design and implement strategies that transform government in order to create an equitable society. Toward these ends, GARE fosters critical connections, shared learning, and leadership development support as racial equity practitioners in government build the skills, influence, and capacity to create change.

To find out more about GARE, visit www.racialequityalliance.org.

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Advancing Racial Equity: A Framework for Federal Agencies

Government Alliance on Race and Equity

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EXECUTIVE SUMMARY

Systemic racial inequities pervade all areas of life in the United States, more than five decades after the legal gains secured by the civil rights movement. The federal government has both the power and the responsibility to address and end these inequities that burden our country. Toward this end, the Biden-Harris administration has mandated federal agencies to embed racial equity across the breadth and depth of government. This requires nothing less than reshaping how the federal government serves its people.

Race Forward, the home of the Government Alliance on Race and Equity (GARE), is committed to supporting the federal government in this process, and to holding it accountable to advancing racial equity. Because systemic racism has lowered everyone's standard of living, implementing a racial equity agenda will both level up outcomes for people of color and improve socioeconomic outcomes for all.

This report offers a framework for advancing racial equity in the federal government that has emerged from years of work with local and state governments across the country. The four components of this framework can guide racial equity practitioners and leaders in federal agencies as they embark on implementing racial equity strategies.

1. Visualizing change: lead with values and vision

Persistent racial inequities demand that all government units examine whether they are set up to meet the purpose of achieving equitable outcomes. An important first step is to develop a shared racial equity vision, with guidance from communities of color, that champions the values of equity, justice, and participation. All public servants should be able to articulate what racial equity would look like in their sphere of work.

2. Normalizing: build a shared understanding and analysis

Turning a racial equity vision into reality first requires coming together to name and understand the problem. A shared analysis of the underlying drivers of inequities is essential, along with identifying the systems that maintain these inequities. This involves shifting from a race-silent perspective to an examination of disparities and the conditions that make those disparities possible and pervasive. Such an analysis, carried out with participation from communities of color, can inform the development of new assumptions, goals, and roles that are more conducive to closing racial gaps and achieving better outcomes for everyone.

3. Organizing: build external, internal, and cross-agency networks

Advancing racial equity requires changing the way government operates. Intentional organizing strategies can drive organizational and institutional change through creating networks, infrastructure, and capacity for racial equity practices. Building different relationships with communities of color is integral to this change effort. Engaging and partnering with communities of color can give rise to new approaches, practices, and solutions, and accelerate the process of change within government.

4. Operationalizing: use a systematic process and racial equity tools

Using a systematic process of inquiry guided by racial equity tools, federal equity practitioners and leaders can plan racial equity initiatives, conduct applied training, and begin institutionalizing racial equity practices and processes. Early initiatives may focus on areas where the need for action on racial equity is greatest, or where they can make the greatest difference. Replicable and scalable projects will encourage uptake by others, within and across agencies.

The report concludes with an overview of existing racial equity tools, their purposes and applications. Tools facilitate a standardized process of inquiry to help practitioners set outcome goals, identify problems, and develop strategic solutions. They can help uncover obstacles and opportunities related to racial equity that often remain hidden within various agency functions. Racial equity tools are designed to insert racial equity considerations into government decision-making processes, including policy, program, and budget decisions.

With the help of a racial equity framework and appropriate tools, many local and state jurisdictions have been able to transform their operations to meet racial equity imperatives. Moving with urgency toward any of the tried-and-tested actions outlined in this report will enable federal agencies to fulfill the Biden-Harris administration's commitment to advancing racial equity.

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WHAT IS THE PURPOSE OF THIS FRAMEWORK

The Biden-Harris administration has committed to a whole-of-government approach to advance racial equity and dismantle entrenched disparities in policies and practices across the federal government. The Executive Order *on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* (Exec. Order No. 13985, 2021) envisions a country that enables everyone to thrive, and a government that fulfills its responsibility to deliver benefits and resources equitably to all. This mandate responds to a profound shift in public discourse driven by a historic movement for racial justice that has infused the urgent demand for racial equity into our society and culture. It seeks nothing short of reshaping how government serves its people.

The Executive Order calls for a systematic process of embedding equity across the breadth and depth of government. Race Forward, the home of the Government Alliance on Race and Equity (GARE), is committed to supporting the federal government in this process, and to holding it accountable to meet this goal. To ensure success, it is essential that federal racial equity work is grounded in a deep understanding of institutional and structural racism, and of the role that government has played in producing and perpetuating inequities. A shared understanding of how racism operates systemically, coupled with a vision and principles to guide change, will enable public servants across government to help improve the life outcomes for communities of color—and the population as a whole.

This introductory guide offers a framework for advancing racial equity in the federal government that has emerged from years of work with local and state governments across the country. It describes the essential components of a racial equity approach and walks racial equity practitioners and leaders in the federal government through the key actions and challenges they will face as they implement a concerted, sustainable racial equity strategy. There is a rich body of knowledge, good practices, models, and lessons available from local and state jurisdictions to support federal agencies in taking action. As companions to this introductory guide, we will make these examples and experiences easily accessible in subsequent topic guides, designed as how-to manuals for federal racial equity practitioners and leaders.

This framework leads with race, based on the recognition that racial inequities are deep and pervasive across all political, economic, social, and cultural systems. The production and perpetuation of racial inequities have been baked into government. We also recognize that race intersects with class, gender, sexuality, and disability, along with other factors, to produce and compound societal inequities. We urge the federal government to focus on racial inequities explicitly but not exclusively. It is crucial to be explicit about what is often obscured, and to be specific where general approaches have failed. There are no "one-size-fits-all" strategies that work for all of the "underserved communities" identified in the Executive Order. To secure maximum impact, focus and specificity are necessary. A focus on racial equity should always be accompanied by careful attention to the complex power dynamics that shape intersecting systems of inequity. The framework, strategies, and tools offered in this guide can help inform related equity initiatives.

By viewing decisions through a racial equity lens, federal agencies can begin to level up socioeconomic outcomes for people of color. But the goal can and should be more ambitious. Beyond closing gaps and eliminating disparities, government should raise expectations about

what improved outcomes could look like for all people. The vision of racial equity is not one in which all population groups are similarly struggling to earn a living wage, pay their rent, and afford medical care. Policies that are failing people of color are failing all of us. In fact, many policy proposals for advancing racial equity—such as greater public investment, changes to the tax code, and wage and workplace reforms—would improve everyone's lives. By creating deliberate systems and supports to advance racial equity, the federal government can produce a "solidarity dividend"[1] that transforms outcomes for all.

Finally, a racial equity agenda addresses complex problems that will not be resolved quickly, and racial equity practitioners and leaders will face inevitable backlash on the long road ahead. However, there are immediate and straightforward steps that federal agencies can and should take to begin advancing racial equity. Moving with urgency toward any of the tried-and-tested actions outlined in this guide will allow agencies to develop a culture of learning that serves as an engine for lasting change.

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1   McGhee, Heather. *The Sum of Us: What Racism Costs Everyone and How We Can Prosper Together.* One World, 2021.

ADVANCING RACIAL EQUITY: FROM WHY TO HOW

Why the Federal Government Needs a Racial Equity Agenda

President Biden's Executive Order rightly highlights "the unbearable human costs of systemic racism," recognizing racism as a pervasive system of power that defines and predicts life outcomes. Systemic racial disparities continue to plague all areas of our society, more than five decades after the legal gains secured by the civil rights movement.

- More than one-third of Black children under the age of five live in poverty, compared to one-tenth of white children.

- Black people are twice as likely to be unemployed than white people, regardless of their level of education.

- Latinx people are three times more likely than white people to live in poverty while working full-time.

- Black people suffer from an almost 20 percent higher exposure to air pollution than white people, regardless of income.[2]

- Native Americans residing on tribal lands are five times more likely than the general population to live in inadequate housing that lacks plumbing, kitchen facilities, or heating.[3]

- People of color are disproportionately affected by COVID-19, with an increased risk for infection, hospitalization, and death. Age-standardized data shows that Latinx, Black, and Indigenous people are at least twice as likely to die from COVID-19 as white people.[4]

Such racial inequities violate the basic human rights of Black, Latinx, and Indigenous communities, as well as other communities of color, while depriving our whole society of important economic and social benefits. For example, if the United States eliminated racial gaps in income, the gross domestic product would increase by $2.8 trillion (according to 2017 data).[5] Systemic racism has lowered everyone's standard of living. A growing body of evidence shows that inequitable societies produce poorer outcomes for all.

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2   All of the above data can be found in the National Equity Atlas, a partnership of PolicyLink and the USC Equity Research Institute.

3   Pindus, Nancy, et al. *Housing Needs of American Indians and Alaska Natives in Tribal Areas: A Report from the Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs.* U.S. Department of Housing and Urban Development, Office of Policy Development and Research, January 2017, p. xix.

4   Artiga, Samantha, et al. "COVID-19 Cases and Deaths by Race/Ethnicity: Current Data and Changes Over Time." Kaiser Family Foundation, October 8, 2021, www.kff.org/racial-equity-and-health-policy/issue-brief/covid-19-cases-and-deaths-by-race-ethnicity-current-data-and-changes-over-time.

5   National Equity Atlas, op cit.

By constructing racial categories that sort people hierarchically, systemic racism produces divisive social relations, in particular racial resentment. This drives a reluctance to invest in everyone's well-being and makes it difficult to unify our country to meet universal needs. The United States spends far less on social protection programs compared to other member countries of the Organization for Economic Cooperation and Development (OECD).[6] We lack important universal public programs, such as universal health care, universal childcare, universal higher education, and guaranteed housing for all. Consequently, the United States has a lower Human Development Index than many other high-income countries—and it is lowered further when adjusted for inequity.[7] This causes needless suffering in all of our communities.

Ultimately, the core reason why the federal government needs a racial equity agenda is that it has both the power and the responsibility to address and end these systemic injustices. From Jim Crow segregation to criminalization and mass incarceration, from redlining to predatory subprime mortgage lending, the federal government has either directly or indirectly produced, facilitated, and sustained racially discriminatory policies and practices—but it can also be a force that paves the way for equity and justice.

Building on Our Civil Rights History: From Non-Discrimination to Equity

The historic mandate President Biden created in his first Executive Order builds on the success and sacrifice of prior generations. Black Americans and their allies' long history of struggle led to the Civil Rights Act of 1964, the Fair Housing Act of 1968, and the Equal Employment Opportunity Act of 1972. These pioneering laws have been interpreted by the courts and in regulatory guidance to prohibit not only disparate treatment (i.e., discriminatory intent) but also disparate impact (i.e., discriminatory effect regardless of intent), as well as the perpetuation of past discrimination. Notably, courts have determined that the Fair Housing Act imposes a duty on the Department of Housing and Urban Development (HUD) and its grantees to take proactive steps to further fair housing and end segregation, which was codified in the 2015 Affirmatively Furthering Fair Housing rule (rescinded by the Trump administration but restored in 2021).

Many other laws include explicit non-discrimination clauses (e.g., the Affordable Care Act of 2010) or have led to the development of relevant tools, such as social and environmental justice impact assessments (e.g., the National Environmental Policy Act of 1969). The federal government also has obligations to ensure the well-being of Native American citizens, as part of its special trust relationship with sovereign Tribes, codified in hundreds of treaties signed with Tribal Nations. Moreover, the United States has ratified the United Nation's International Convention on the Elimination of All Forms of Racial Discrimination, which requires, among other things, that the federal government review and rescind all laws, policies, and regulations that have a racially discriminatory effect. Many of these federal and international laws mandate regular reporting and some type of impact assessment prior to government action, but these mechanisms and tools have been underused and are constrained in their reach.

The Executive Order asks for new approaches and methods *to enable federal policies and programs to proactively close gaps and advance racial equity, not just avoid discrimination.*

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6   *Social Expenditure Database, 2019 edition.* Organization for Economic Cooperation and Development, https://stats.oecd.org/Index.aspx?datasetcode=HSL.

7   Conceição, Pedro, et al. *Human Development Report 2020: The Next Frontier. Human Development and the Anthropocene.* United Nations Development Programme, 2020, p. 351. http://hdr.undp.org/sites/default/files/hdr2020.pdf

The focus on the federal government's own policies and actions—including budgets—is crucial here. While the civil rights framework provides a significant lever for addressing racial inequities, it is largely structured to deal with discrimination through private channels, encouraging litigation rather than government action. Therefore, it is important that agencies develop legal strategies that utilize the full force of civil rights provisions while expanding existing legal interpretations. The mandate for agencies' legal counsels is to enable deeper and broader racial equity approaches that build on the foundation created by the civil rights movement.

What It Will Take to Advance a Racial Equity Agenda

To address and end systemic racial inequities, federal agencies and the public servants within them should **develop a clear understanding of how government policies, programs, practices, and budgets continue to produce inequitable outcomes.** Neither individual bias nor explicit intent is needed to design programs that create and maintain racial disparities. Rather, it is the lack of attention to equity that almost invariably generates "unintended" effects that benefit some and burden others. There are no race-neutral policies and practices.

> *There are no race-neutral policies and practices.*

Because government actions impact communities differently, depending on how those communities are situated in society, a racial equity agenda **requires changing the way government operates.** All policies and practices must be designed with a clear understanding of how they shape racial equity.

This demands an institutional, whole-of-government approach that embeds equity as a principle in all government operations, systems, processes, and decisions. Reviewing policies, programs, and practices through a racial equity lens will create new insights, new approaches, and new solutions. This shift in perspective can begin with small-scale efforts anywhere within an agency. A pilot project can serve as a test for new practices, as a training ground, and as an inspiration for others. With sufficient internal leadership, it is possible to initiate, sustain, and scale promising practices.

Organizational change is never a one-off effort but requires developing a new shared language and analysis, propelled by sustained organizing. It will take time. And it is not primarily inward-looking; the purpose of a racial equity practice is not only to change government but to make a **clear difference in the lives of people of color and society as a whole.**

What Federal Agencies Can Learn from a Growing Field of Practice

While federal public servants and political leaders have taken up important racial equity initiatives in the past decade, the **systematic consideration of racial equity** in the federal government is in its early stages. There is, however, a growing community of practice in local and state government jurisdictions, as well as in the philanthropic and nonprofit sectors, with the know-how and tools to support a systematic racial equity agenda within and across governmental organizations. Local and state governments have learned numerous lessons

about patterns of racial inequities, root causes, and solutions. They have developed models and practices to address the disconnect between what a government agency is set up to do and the disparate impacts of their actions on communities. They have committed to engaging in long-term change management, while also leading with urgent, intentional action. Federal agencies can draw on a wealth of experience from numerous local and state government jurisdictions. As GARE members, many of these jurisdictions have contributed to designing, testing, and refining the framework, strategies, and tools introduced in this guide. In return, the federal government has the opportunity and power to encourage, support, and connect with racial equity initiatives at the state and local levels, and in the private sector.

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FROM PLANNING TO ACTION: ESSENTIAL COMPONENTS OF A RACIAL EQUITY FRAMEWORK

Changing the ways in which the institution of government operates may sound ambitious, but governance strategies and practices constantly evolve, and some level of organizational and institutional change occurs regularly. Mandates, such as the Executive Order, can deepen and accelerate this change, as can shifts in public norms and discourse, along with examples of what works elsewhere.

Internal change agents can advance a racial equity agenda by:

» Harnessing pressure created by legal or administrative mandates, and by communities and other external actors;

» Envisioning and normalizing different values, principles, and behaviors; and

» Encouraging the replication of best practices or models implemented elsewhere.
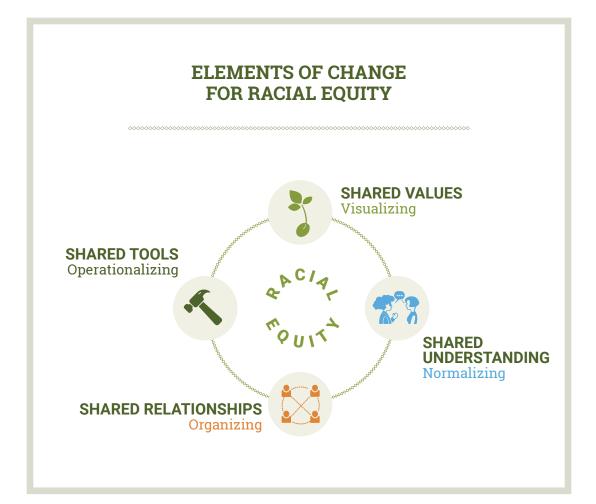
These strategies can be effective at all levels of the federal government. In particular, the cross-agency units charged with coordinating the implementation of the Executive Order have an important role to play in developing and promoting strategies for change. The Domestic Policy Council (DPC) is tasked with embedding equity principles, policies, and approaches across government, and the director of the Office of Management and Budget (OMB) is responsible for researching and planning equity interventions.[8] Both can encourage and support the uptake of a racial equity framework among and across departments, agencies, and other governmental units.

In the past decade, local governments developed a now widely used organizational change model to advance their racial equity work. This guide draws on that model to apply the essential components of a racial equity framework to the federal context. The intention is not to prescribe a certain set of steps but to guide a process of systematic inquiry that informs new ways of operating. Shifting perspectives and asking different questions are prerequisites for embedding racial equity within government. This is a gradual, iterative process that entails revisiting each component repeatedly, but it must start with some urgency.

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8   OMB recommended several strategies for long-term change management in its first report to the president. See: *Study to Identify Methods to Assess Equity: Report to the President*. Executive Office of the President, Office of Management and Budget, July 2021, www.whitehouse.gov/wp-content/uploads/2021/08/OMB-Report-on-E013985-Implementation_508-Compliant-Secure-v1.1.pdf.

ELEMENTS OF CHANGE
FOR RACIAL EQUITY

SHARED VALUES
Visualizing

SHARED TOOLS
Operationalizing

RACIAL EQUITY

SHARED UNDERSTANDING
Normalizing

SHARED RELATIONSHIPS
Organizing

Lead with Values and Vision
(Visualizing Change)

Shared values and a clear vision for racial equity will help to embed and deploy a racial equity approach in government decision-making. Envisioning and valuing racial equity can start in any organizational unit; ultimately, each agency, department, unit, and team should be able to articulate what racial equity would look like in their sphere of work.

Why is this important?

- All public servants should be able to clearly articulate how their work contributes—or could better contribute—to fulfilling the government's purpose of serving the common good and achieving equitable outcomes for all.

- To this day, the actions of federal agencies have favored—intentionally and unintentionally—white people over people of color. This demands a reimagination of the vision and values that guide government action, along with a reexamination of the conditions needed to produce desirable and equitable outcomes for people of color and the population as a whole.

What are the key actions to consider?

- *Review the purpose of an agency and its organizational units in the context of the Executive Order's racial equity mandate.* Each agency and its units will have their own interpretation of how their work contributes to fulfilling the purpose of government. Since the Executive Order stresses that racial equity is integral to the federal government's purpose, agencies should examine whether they are set up to meet that purpose. This goes beyond assessments or plans related to certain functions or workstreams; rather, it entails questioning how an agency fulfills its role and purpose, and possibly reconfiguring its purpose.

- *Clarify the values of equity, justice, and participation championed in the Executive Order.* Each agency and organizational unit should define what these values mean for their work in a consistent and coordinated way across the federal government. Often, such values remain vague ideals rather than guiding principles to shape everyday work. To bring these values to life, racial equity practitioners and leaders should facilitate conversations that give values a shared meaning, connect them to goals and results, and infuse them into organizational cultures and accountability systems. They should listen to and lift up the voices of people left behind by past and present inequitable systems to help define values and set a new vision attuned to the government's obligations to historically excluded groups.

- *Envision what racial equity would look like in an agency's sphere of work.* Any organization that has the power to cause disparities also has the power to reverse them and advance more equitable outcomes. Because this must be an explicit objective, each agency and its units should develop a racial equity vision that stretches from external goals to internal capacity. This cannot be a vision of avoidance limited to preventing discrimination, barriers, or burdens. Rather, equity practitioners and leaders should help agency staff envision positive community-level outcomes that respond to the needs of people of color. Such a vision will need to articulate and model a different relationship between government and communities most impacted by racial inequities. To begin creating accountability to communities of color, agencies should conduct meaningful engagement processes when developing their visions, goals, and outcomes. Ultimately,

each government unit should envision a better sharing of decision-making power and resources with the communities they serve, thus deepening democracy.

What are the key challenges?

- Organizational visions and values can be too abstract and disconnected from daily work practices. While a shift in rhetoric is helpful, paying lip service to racial equity is not. Equity practitioners and leaders should *be clear about how their department's vision and values guide action.*

- It is not always easy to see how the work of one individual or one unit relates to a bigger vision and broader values. Many organizations and their staff are not very familiar with visualizing the desired outcomes of their work, beyond routine performance measurements. A *racial equity vision must be relevant to a specific area of work,* and sufficiently concrete to inform the development of viable solutions.

- Vested interests may oppose a vision and values that center racial equity. Equity practitioners and leaders should consider *developing a narrative strategy that debunks the myth of race-neutral approaches* and highlights the universal benefits of advancing equity.

Questions to ask yourself:

▌ What is government for?

▌ To whom is your vision accountable?

▌ What obligations are you seeking to fulfill?

▌ Whose expectations are you aiming to meet?

▌ Can you fulfill the current mission of your agency without addressing racial inequities?

A racial equity vision should embolden and empower everyone in government to act on their responsibility for advancing racial equity. An organization that embeds such a vision will produce a growing number of racial equity leaders and practitioners and will support their increasing influence, exercised vertically through the ranks and horizontally across the agency. It will allocate resources to this work and build the infrastructure to develop and deploy a shared analysis and practice. An internal racial equity vision will commit to creating a culture that normalizes racial equity, that adopts more equitable policies and practices, and that sets examples and inspires others.

Build a Shared Analysis (Normalizing)

We need a shared language to collectively analyze the causes and systems of racial inequity, because we cannot change what we cannot name and understand. As a foundational matter, it is crucial to distinguish between individual bias and institutional and structural racism. Systems of racial inequity operate independently of prejudice and discriminatory behaviors by individuals. Therefore, turning a racial equity vision into reality requires understanding the underlying drivers of inequities, along with the systems that maintain these inequities. Practitioners should not only be able to recognize racial disparities but also identify the root causes of those disparities. Such an analysis can reveal that a focus on narrowing gaps between racial groups may be ineffective, and that a more fundamental redesign of an underlying approach, goal, or policy is needed.

For example, to improve academic outcomes of students of color, is it sufficient to provide additional tutoring for students or diversity training for teachers, or is it necessary to rethink the curriculum, change the school environment, or revisit education funding formulas? Disparities may be symptoms of a deeper problem. By applying an analytical frame that disrupts the usual way of approaching policy and programmatic questions, racial equity practitioners and leaders can shift the attention from a particular disparity to the conditions that make disparities possible and pervasive. This enables the development of solutions that both meet the needs of those most impacted by inequities and create lasting benefits that reach beyond a particular racial group.

> **Targeted universalism** is an approach that sets universal goals or outcomes that benefit all, then develops targeted strategies for different groups to reach these outcomes. Actions that address gaps between different groups are inextricably linked to actions that address gaps between a group and a universal goal or outcome. Disparities are measured in relation to desired outcomes, not just by comparing different groups.

Why is this important?

- Systemic and institutional racism work in complex and sometimes hidden ways, and it is important to know how these systems are produced and reproduced. A shared analysis that explores the underlying structures that produce racial inequities – and specifically the role of government – can help identify levers for dismantling inequities.

- Uncovering and addressing long-denied, tolerated, or actively promoted racial inequities requires challenging assumptions, changing the questions, and developing new guidelines for creating different solutions. An assessment of how to close outcome gaps between different racial groups is important, as is a review of whether current outcome goals and related policy ideas are the right ones for meeting everyone's needs.

Definitions:

EQUALITY
Treating everyone the same, no matter where they're starting from or whether outcomes remain unequal. "Equality" typically means equal opportunities and access.

EQUITY
Giving everyone what they need to thrive, based on an understanding that different people start in different places due to historical and current injustices. "Equity" is about equal outcomes.

RACIAL EQUITY
Eliminating race-based disparities, so that race cannot predict life outcomes. This will improve outcomes for all.

> **INSTITUTIONAL RACISM**
> Policies, procedures, and practices that work better for white people than for people of color, often unintentionally or inadvertently.
>
> **STRUCTURAL RACISM**
> The systemic operation of racism across institutions, which permeates political, economic, and social systems and cultures. It combines and compounds institutional racism into a system of power that negatively impacts communities of color in all areas of life.

What are the key actions to consider?

- *Review how racial inequities are shaped by historical pathways.* By reflecting on the history of racial inequities—with a focus on a particular agency's contribution to those inequities— equity practitioners and leaders in federal government can help build awareness of how different groups of people came to be situated within current systems. This reveals the pathways to disparities and government's role in maintaining those paths.

- *Examine how racial inequities are stacked across sectors.* By looking across sectors, equity practitioners and leaders can analyze how systems sort people, stacking inequities from one sector to another. From housing, health, and education to jobs and economic security, inequities reinforce each other and compound from one sector to another, creating a cycle of disparate outcomes. While government agencies are organized by sector, structural racism works across these sectors, maintained by systemic linkages between income, education, geography, and work. A cross-sectoral analysis can yield strategies for breaking those links and disrupting the cycle of inequity.

- *Account for the convergence of intersecting systems of oppression.* By recognizing the confluence of race, class, gender, and other factors, racial equity practitioners and leaders can cultivate an awareness of how these factors intersect and how they compound inequities. This can inform, for example, the selection of data categories. Too often, class or income is used as a stand-in for race, yet neither can be reduced to the other. The use of the income denominator as a starting point for addressing racial disparities must be justified; it is possible that entirely different data categories are required. An intersectional lens can also encourage the linkage of different equity agendas, e.g. racial equity and gender equity, by identifying specific points of overlap where government interventions might be most urgent or productive.

- *Interrogate assumptions and frameworks.* By examining the cumulative historical and structural effects of racial inequities, equity practitioners and leaders can pinpoint the federal government's role in producing or maintaining these inequities. This requires examining underlying norms and assumptions that prevail at a deeper institutional level, beyond a specific area of operation. A default frame for many government policies and programs calls for "fixing" people instead of systems, emphasizing deservingness, individual responsibility, and scarcity. These norms have served to justify program designs that can exacerbate inequities. For example, racial equity practitioners have shown how a public health approach that blames people for dietary choices—as opposed to examining food deserts, inadequate income to buy healthy food, and erratic work schedules that disrupt healthy eating—misses the factors that drive disparities. These factors are shaped by historical and current government policies, such as development planning, that are grounded in both explicit and implicit institutional racism. By exposing the norms and assumptions that undergird so-called race-neutral approaches, agencies can identify and dismantle the "unintended" consequences of such policies and

programs, which have served to maintain racial disparities.

- *Engage communities of color in shaping government norms, goals, and roles.* People of color often have markedly different expectations of government than white people, preferring a government that assumes greater responsibility for public services and infrastructure. [9]Yet their lives show a different reality: People of color disproportionally encounter government in its punitive functions (e.g., policing, criminal justice, immigration, eligibility controls for public programs) whereas white people are more likely to experience government in its supportive and facilitative roles (e.g., higher education loans and grants, the mortgage interest tax deduction, the health insurance tax exemption). Without increased input and influence from communities of color, agencies are likely to continue prioritizing goals and functions that produce burdens for some groups and benefits for others. Moreover, if communities are unsupportive of government actions, the effectiveness of those actions may be diminished. Equity practitioners and leaders should help cultivate an awareness of different lived experiences and find pathways for engaging communities of color in shaping government goals and roles.

- *Adopt guiding principles to make an agency's vision and values actionable.* Such principles can be put forward by equity practitioners and leaders and normalized in a collective process. Principles might reflect the need to:

  » Incorporate racial equity considerations in all decision-making;

  » Uphold the dignity of all people served or affected by government actions;

  » Prioritize outcomes that improve people's lives;

  » Center the participation of communities most impacted by racial injustice; and

  » Be fully transparent and accountable to communities of color.

- *Use targeted universalism as a strategic approach that addresses the deepest racial inequities and improves outcomes for all.* This requires establishing universal outcome goals that lift up all people while paying close attention to those who are often excluded. Targeted universalism rests on a twofold understanding: On the one hand, general policies, practices, or investments that do not consider how people are situated differently will exacerbate inequities even when they achieve positive aggregate results. The proverbial rising tide does not lift all boats, yet many current universal policies are colorblind. The Federal Emergency Management Agency's (FEMA) approach to disaster assistance aptly illustrates this: Its focus on assessing property damage disproportionately benefits white disaster victims, who are more likely to have higher-value claims and the resources to make those claims, thus widening the racial gap.[10]

On the other hand, current targeted strategies that seek to reach those most disadvantaged will remain band-aids if they fail to address the underlying structures that produce and maintain inequities. In fact, many targeted supports, often in the form of means-tested programs, perpetuate exclusionary systems. Not only do they impose an administrative burden, but they also often include punitive practices (e.g., the overbroad range of causes for evictions in public housing).

Programs designed with a targeted universalist approach would identify barriers toward achieving universal outcomes and aim to provide unconditional support for overcoming those barriers. In the example of FEMA assistance, instead of prioritizing the restoration

9 *Americans See Broad Responsibilities for Government; Little Change Since 2019.* Pew Research Center, May 2021, www.pewresearch.org/politics/wp-content/uploads/sites/4/2021/05/PP_2021.05.17_scope-of-government_REPORT.pdf.

10 National Advisory Council. *Report to the FEMA Administrator.* Department of Homeland Security, FEMA, November 2020, p. 12.

of financial losses, FEMA could strive for a universal outcome that ensures all disaster victims receive adequate housing, continue their children's schooling, and return to work. A racial equity assessment would identify the specific needs of people of color in relation to this outcome. If assistance were provided based on an assessment of needs rather than damage, funds could be distributed more equitably to ensure a safe recovery for all.

What are the key challenges?

- Current analyses and planning processes tend to ask the wrong questions: How much do we do? How many do we serve? How well are we operating? Switching to a racial equity lens, an analysis might ask instead: **Who is better off? Who is left behind?** How can we avoid causing harm? How can we improve people's lives?

- Racial equity is often pitted against dominant frameworks and norms, such as colorblindness, cost-effectiveness, and efficiency. Federal equity practitioners and leaders should **assess the hidden consequences of the current policy frame,** such as unintended program effects, the costs of inequity, and the social externalities of efficiency.

- Existing anti-discrimination mandates can be interpreted narrowly or insincerely, which can undermine a broader understanding of racial equity concepts. Equity practitioners and leaders should **push legal counsel to issue more expansive, equity-focused guidance** on the implementation of existing laws.

Questions to ask yourself:

| What has been your unit's role in producing benefits and burdens for different racial groups?

| What assumptions guide your work?

| What norms and values does your unit prioritize?

| Can you identify the underlying causes that maintain inequities in your area of work?

| Do you use universal or targeted strategies, and how are they connected?

Organize for Equity: External, Internal, and Cross-Agency Networks (Organizing)

Advancing racial equity will not be possible without lasting organizational, institutional, and societal change. The federal government's equity agenda needs a robust administrative, financial, and legal infrastructure, together with a critical mass of staff, to harness the necessary power, capacity, and resilience to end the systemic racism it has upheld for so long. While such transformation can begin with the stroke of an executive pen, it requires a process grounded in organizing to achieve lasting change.

"Organizing" is a ubiquitous but sometimes invisible process that intends to create internal or external pressure by galvanizing collective action. Organizing seeks to disrupt the status quo, such as rules, cultures, and silos of work, and to build the power for putting forth new rules, values, and practices. This requires identifying the various dimensions of power inside and outside an organization, which are embedded in a web of relationships, norms, and practices. Institutions such as the federal government can serve to maintain existing relations of power through dominant norms and rules. This is how government shapes society and implicitly perpetuates structural racism, but it is also, conversely, why reshaping government can advance different racial equity outcomes.

"Organizing" is a ubiquitous, sometimes invisible process that creates internal or external pressure by galvanizing collective action.

Engaging and partnering with communities of color

At the heart of a transformed government lies a different relationship with the people it serves. The meaningful engagement of communities most impacted by racial inequities is an integral part of all components of the racial equity framework presented here. Community voices are needed to shape the government's racial equity agenda and to drive the change that can make that agenda a reality.

Why is this important?

- Government has too often made decisions *about* communities of color that have inflicted tremendous harm. In recent years, federal agencies have begun to introduce various forms of community engagement to fulfill their obligations of transparency and accountability. There is a growing understanding that the legitimacy of government depends to a large extent on whom government listens to. If political influence appears to be a function of wealth, connections, race, or gender, democracy is in peril. To increase the participation and power of those who have been excluded, marginalized, and harmed, agencies will need to be intentional, thoughtful, and genuinely collaborative. They will have to fold engagement into policy and program design, and they will need to shift and expand whom they listen to.

- Community engagement improves outcomes, in addition to deepening democracy. When engagement takes the form of collaboration, partnerships, or community leadership, it enhances the effectiveness of public policies and programs. This is because the people directly impacted by a problem often have a better understanding of that problem and a better sense of appropriate solutions.

- Partnerships between agencies and community organizations can accelerate the process of change within government. External pressure from communities impacted by racial injustice can raise the visibility of racial equity issues and motivate government leaders to act. Consistent community engagement, conducted with integrity, can also permeate across administrations and sustain momentum over time.
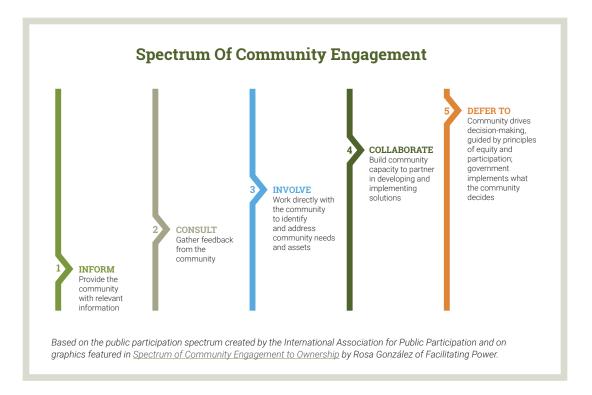
What are the key actions to consider?

- *Develop a clear purpose, principles, and process for community engagement, with input from those communities.* Purposes can range across a spectrum of engagement, from passive, one-way government information sharing to consultation and data gathering; to more collaborative advisory and planning processes, co-creation, and joint decision-making; and to community-led initiatives supported by government.[11] To drive and support a transformative racial equity agenda, engagement should proceed to at least a collaborative stage. The process or method of engagement should match the purpose. For example, town halls and listening tours work for consultation, but not collaboration; community or stakeholder advisory boards can inform but not shape government decision-making; participatory needs assessments or co-design workshops can help co-create solutions; and funding or assisting community-led networks can enable more permanent partnerships to guide government programs. Principles of engagement, which should be developed with the communities involved, cover what government should know and do, how it should operate, and what it can do to build community capacity and achieve outcomes in line with community priorities.

Example: Racial Equity in Public Participation

Many federal agencies, divisions, and units have developed public participation guides, drawing on decades of local, national, and international experiences of making community engagement more meaningful. The Environmental Protection Agency (EPA), for example, published a public participation guide in the early 2000s, using the spectrum of engagement model developed by the International Association for Public Participation, and, more recently, a roadmap for community action, prepared for the EPA's former Community Action for a Renewed Environment (CARE) program.

Other agencies have their own participation guides; the Centers for Disease Control and Prevention (CDC), for example, developed a set of community engagement principles. While practitioners have adapted those general guides for racial equity purposes, as a next step, agencies should add an explicit focus on racial equity to their participatory methods, along with a greater emphasis on enabling communities of color to shape agency policies, programs, and decisions.

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11 The spectrum of public participation model was developed by the International Association for Public Participation (IAP2).

Spectrum Of Community Engagement

1 INFORM
Provide the community with relevant information

2 CONSULT
Gather feedback from the community

3 INVOLVE
Work directly with the community to identify and address community needs and assets

4 COLLABORATE
Build community capacity to partner in developing and implementing solutions

5 DEFER TO
Community drives decision-making, guided by principles of equity and participation; government implements what the community decides

Based on the public participation spectrum created by the International Association for Public Participation and on graphics featured in Spectrum of Community Engagement to Ownership by Rosa González of Facilitating Power.

- ***Ensure that the principles guiding community engagement are backed up by concrete government commitments.*** Data must be shared, feedback must be implemented, and government follow-up must be transparent. Across the spectrum, engagement should be connected to government decision points, which in turn must relate to tangible outcomes that are relevant to communities. Any engagement beyond information sharing should be tied to meaningful policy, program, and budget levers. Conversely, any relevant government decision should be shaped by community engagement. For example, there should be a meaningful engagement process on the racial equity action plans that agencies have been tasked to develop, not merely a perfunctory public comment period. Beyond joint decision-making, government can and should offer other reciprocal actions to support community engagement. Direct funding for community-based organizations or leveraging relationships with philanthropy can help build capacity. Agencies can also provide direct technical assistance or require state and local grantees to spend a percentage of their funding on community engagement and capacity building. Partnerships with state or local agencies can help facilitate community engagement, as they bring contextual knowledge and networks.

- ***Build long-term partnerships with community-based networks, racial equity coalitions, and civil society organizations.*** Through its convening and grantmaking functions, the federal government can also catalyze the creation of decentralized networks; it has already intermittently done so around issues such as transportation, environmental justice, and equitable development. Such networks and partnerships can dissolve the rigid distinctions between government on the one hand and the people, or communities, on the other. Community partnerships that build on community assets and prioritize local decision-making can lead to the codesign and coproduction of public services, with the potential to improve responsiveness and accountability.

What are the challenges?

- A veneer of community engagement is sometimes used to legitimize decisions that have already been made. Any such performative, check-the-box type of engagement

must be avoided. As participatory initiatives have become more popular, racial equity practitioners and leaders should **be clear about the conditions that make engagement relevant to specific communities.**

- A lack of trust within excluded communities can be hard to overcome. Acknowledging the history of institutional racism—for example, by publishing an account of harmful government policies and programs—may help **build credibility.**

- Listening to the right people at the right time can pose a time-consuming planning challenge. Acting on public input, while managing other constraints, requires political will and leadership. Any participatory process must be adequately resourced and supported; **longer-term community partnerships can offer consistent external guidance.**

Building capacity for organizational change

To institutionalize a racial equity approach, agencies should have a clear understanding of how their internal systems are currently organized to function, and how agency staff is organized to act. This includes formal rules and procedures as well as underlying norms and assumptions that drive behaviors and decision-making. All of these organizational components can perpetuate racially disparate impacts. Managing organizational change in line with a racial equity agenda requires building every organizational unit's capacity to do things differently. This may entail shifting organizational cultures and cultivating new behaviors, routines, and skills. Leadership has an important role in this process, including maneuvering political and legal obstacles. It is possible to begin small, in a single unit, and build out a new way of working from there.

Why is this important?

- All organizations use standardizing methods to organize how their employees take action. These methods ensure organizational stability and predictability but can produce inertia. They consist of laws, rules, regulations, and policy manuals; agency missions, concepts, and frameworks; administrative protocols; formal linkages to other organizations; and performance reviews, job descriptions, and skill development. It is important to identify how each of these methods can thwart racial equity goals.

- Federal racial equity practitioners and leaders must organize to change obstructive ways of working and overcome organizational inertia. This means coordinating and mobilizing people and resources; developing new equity leaders; and enabling staff to develop decentralized relationships, both internal and external, to strengthen their racial equity work. Once a critical mass of staff is motivated and skilled in applying a racial equity frame, the organization can reach a tipping point where a racial equity approach can become part of a new standardized method of operation. This will ensure that racial equity practices continue when political leadership changes.

What are the key actions to consider?

- **Secure resources and build infrastructure for racial equity work.** Equity practitioners and leaders need to ensure that they have sufficient resources, staff, and time available to build out racial equity work. Initially, this may require redirecting existing resources and staff. Agency leadership should establish permanent cross-functional equity core teams with dedicated budgets and diverse staff. Racial Equity Core Teams are a critical piece of many GARE jurisdictions' infrastructure, serving as the engine for change. They

are responsible for coordinating the implementation of racial equity plans and activities across all agency functions, and can encourage consistency of analysis, methods, and training.

- *Develop racial equity leadership.* The role of existing leadership should be to encourage and legitimize racial equity work, validate those leading it, and secure adequate resources. Additionally, new forms of leadership can be developed at all levels and across all functions. Everyone in government has positional power and can play a role in advancing racial equity. Racial equity practitioners and leaders should identify, cultivate, and support early adopters across the organization, especially among career staff. Civil servants' organizational know-how and staying power are essential to achieving sustainable change. If equity practitioners map the different levels and spaces of power, they can act strategically to take up openings, collaborate, and grow the power of internal change agents.

- *Develop internal and external accountability mechanisms.* Integrating racial equity considerations throughout an organization's systems and functions can start top down, with mandates, regulations, and rules. If codifying racial equity approaches is not yet within reach, accountability mechanisms also can be built from the bottom up, for example through embedding racial equity considerations in project planning, implementation, and metrics, as well as performance incentives and reviews. The latter approach can leverage existing laws, policies, priorities, and good practices. It should ensure that staff receives the guidance, tools, and new skills to be successful. Any racial equity initiative should make data and results available to political leaders, so that good practices can filter up and influence higher-level policymaking. Externally facing accountability mechanisms should publicly measure and communicate an agency's progress in improving racial equity outcomes; local practitioners have found that a lack of monitoring and evaluation also means missed organizing opportunities and less internal and external attention to racial equity.

What are the key challenges?

- Racial equity efforts are easily marginalized, whether through under-resourcing, sidelining, or performative declarations that conceal inaction. Setting up *racial equity core teams that reach across agency functions and activities* can institutionally empower equity practitioners and leaders and equip them for deep, systemwide work.

- Working conditions in large organizations make it difficult for individuals to think outside the box and take initiative; in fact, high workloads, time constraints, and ambiguous or incomplete information may make staff more susceptible to implicit bias. Additionally, the relationship between politically appointed staff and career civil servants can be quite weak. Racial equity practitioners and leaders should *ensure that staff are rewarded for adopting racial equity approaches,* and for collaborating with others in advancing this work.

- The changing nature of political leadership means that racial equity teams may lose their champions. Lessons learned at the local level point to the importance of cultivating political support beyond current champions and across administrations. To secure maximum sustainability, racial equity practitioners and leaders should *combine a political strategy with an effort to institutionalize racial equity processes and tools.*

Building networks for institutional change

The federal government's agencies and offices, taken together, form a powerful institution that imposes norms and rules on society. These will need to change to make progress on racial equity. The Executive Order commits the Biden-Harris administration to a whole-of-government racial equity agenda that matches the scale of the change needed.

Why is this important?

- The Executive Order's whole-of-government agenda is a call for institutional change that reaches beyond individual agencies. Heeding this call demands the creation of a networked infrastructure for racial equity across the entire government to enable the diffusion of approaches and practices.

- Although institutional rules and systems are designed to maintain the status quo, they are also constantly evolving, which means change is possible. But without disrupting existing feedback loops—e.g., rewards for the way things have always been done—institutional development will stay on the same path. The Executive Order's mandate offers an initial disruption; change agents that strategically step outside their own sphere of work, build alliances, and tap into cross-agency networks can push this forward and help forge a different path.

What are the key actions to consider?

- *Strengthen the central equity management structure* set up by the Executive Order: The Domestic Policy Council and the Office of Management and Budget should establish a permanent racial equity office to nurture and coordinate racial equity strategies and initiatives across agencies. A dedicated, centralized support structure could facilitate the systematic adoption and consistent and sustained application of a racial equity framework within and across agencies.

- *Build out interagency structures and processes* to enable cross-pollination and diffusion of racial equity approaches, encourage mutually reinforcing activities, and lift up promising agency practices. This can facilitate mutual learning and replication of models and mitigate uncertainty and risk. Agencies should consider setting up interagency racial equity teams, as well as tapping into the many interagency work groups that already exist.

- *Leverage external allies* whose expectations, demands, and expertise can lend legitimacy to internal change efforts. Change agents within government should build relationships with racial equity organizations and movements and connect these external stakeholders to institutional change efforts. This will help counter the voices of vested interests defending the status quo.

What are the key challenges?

Institutional inertia is maintained by dominant norms, reassuring routines, self-reinforcing measurements of success, and influential vested interests, among other things. For example, in many areas of government, the norm of cost-efficiency trumps all other considerations. This stifles both change in general, which carries initial transaction costs, and racial equity initiatives in particular, whose results do not appear on the credit side of the ledger. However, an internal and external organizing strategy can address these and other challenges. It can **build a cohort of change agents** who normalize racial equity values and measurements, legitimize them by leveraging internal mandates and external pressure, and encourage and reward the replication of model practices.

Preparing for external pushback and backlash

Any meaningful change initiative that seeks to unsettle dominant rules and routines will inevitably face opposition and backlash. While internal resistance mainly arises from institutional inertia, external pushback and backlash are driven by political forces outside the control of government actors. It is important that change agents anticipate external opposition, conflicts, and setbacks, and that they develop the resilience to withstand or adapt to challenges.

Why is this important?

- External opposition to racial equity initiatives manifests in different forms, such as incendiary media coverage, spurious legal challenges, and hostile political campaigns. Racial equity change agents should prepare for and preempt external opposition, thereby inoculating against attacks.

- Racism has historically been used to divide and conquer, be it through dog-whistle tactics or outright attacks on people of color and their rights. Racial equity goals are routinely dismissed as "cultural" and pitted against so-called bread-and-butter economic issues. Government change agents have a responsibility to rise above such divisiveness and offer a clear narrative that situates structural racism at the core of the unjust economic and political systems that impede the universal enjoyment of rights in this country. Whereas oppositional forces seek to isolate racial equity goals, equity practitioners and leaders should position racial equity as integral to improving everyone's lives.

What are the key actions to consider?

- *Develop a proactive communications strategy* centered on a coherent narrative that presents racial disparities as an obstacle to achieving universal goals. GARE members have found the messaging model of affirm, counter, and transform useful. An interagency racial equity office should direct communications, possibly with assistance from philanthropic and racial justice organizations that can help craft and echo messaging.

- *Preempt legal challenges* by analyzing and demonstrating the legal defensibility of proposed solutions. Agencies should use their full authority to interpret laws, which could include reviewing the adequacy of existing legal interpretations and issuing new guidance on civil rights mandates.

- *Collaborate with external stakeholders* to deflect and counter attacks. Racial equity practitioners and leaders in government who partner with community-based and civil society organizations can leverage those voices to counteract opposition from vested interests.

What are the key challenges?

- Vocal public opposition can quash political will and increase political timidity. Change agents should inoculate staff and leadership against predictable attacks by putting in place *a robust support structure to build resilience,* including communication guidance, legal tools, and external partnerships.

RESOURCE

Advancing Racial Equity: A Framework for Federal Agencies

Government Alliance on Race and Equity

- Some opposition may not present itself in oppositional terms at all; rather, it may seek to maintain the status quo and deprioritize racial equity. This can happen, for example, when advisory groups, task forces, or other public appointments are composed of the usual types of influencers. It is important that equity practitioners and leaders seek to *change who has a seat at the table.*

- Many states are continuing their long-standing opposition to addressing racial equity, including by preempting what local jurisdictions can do. Agencies should consider adopting *racial equity-centered guidance for the use of federal dollars* by states and localities, leveraging the power of the purse to incentivize state action on racial equity. Cooperation with states that are committed to racial equity will also be important to build momentum and develop replicable practices.

Operationalize Racial Equity: Process and Tools (Operationalizing)

Operationalizing a racial equity agenda can begin with small-scale models and pilots, provided they are set up to be scalable, sustainable, and replicable. A process of systematic inquiry, guided by principles and probing questions, can yield effective strategies for action at any scale or level. Agency divisions or units will need certain permissions, resources, staff, and time in order to plan and prioritize racial equity actions, but they do not need to wait for broader organizational change. In fact, smaller initiatives can serve to create buy-in from larger groups of people in different parts of an agency through testing new practices and showcasing positive results. Small-scale initiatives can be replicated and scaled up and may ultimately create a tipping point for organizational change. With the systematic use of racial equity tools, a team can begin to build out a racial equity practice, foster a culture of learning, and integrate equity into broader strategic plans.

Why is this important?

- Although operationalizing is listed as the final component of the racial equity framework presented here, it could also be the first. Without a "learning by doing" attitude, racial equity could easily get stuck in the planning stages. To some extent, agencies know what is wrong and need to overcome the hesitation to try and make it right. With a few high-impact examples of success, an agency can solidify the federal government's racial equity agenda and help protect it from political interference.

- A growing community of practice has developed tried-and-tested racial equity tools that can guide federal action. Planning a practical intervention can serve as a training ground for staff and cross-fertilize similar initiatives in other parts of the agency or across agencies. This can be a key ingredient in a recipe for overcoming institutional inertia.

What are the key actions to consider?

- *Secure the minimum conditions for implementing a meaningful racial equity initiative.* This should include some level of political, legal, and financial infrastructure to ensure the capacity to launch and implement this work. In addition to the Executive Order, racial equity practitioners can also leverage civil rights mandates, anti-discrimination clauses, and requirements for social and environmental impact assessments to justify and resource a racial equity project. This can be either a new project or a new approach applied to an existing workstream, using a systematic racial equity process and racial equity tools. In either case, making sufficient resources, staff, and time available is crucial and requires internal leadership support. While a project can be small, it is important that it is set up for success.

- *Engage in a process of systematic inquiry* to ensure that implementation strategies and methods are in line with desired outcomes. A number of *racial equity tools* are available to guide equity practitioners through the process of turning outcome goals into actions. To determine appropriate tools, practitioners should identify the type of action or initiative they intend to prioritize. Initiatives can be opportunity-driven; however, it might help to establish criteria for taking priority action. A team could focus on areas where the need for action on racial equity is greatest, or where they can make the greatest difference. Operationalizing racial equity in high-impact program areas first will help build momentum for a broader organizational shift, provided it matches

practitioners' level of readiness. Regardless of which type of initiative is selected, it is crucial to focus on the desired effect, not just the effort. Measuring results is more important than measuring performance.

A standard racial equity tool guides practitioners through a process of inquiry that starts with determining desired outcomes at the community level. This commonsense first step goes against the grain of many de facto planning processes, which begin with a policy or program. Being clear about desired population-level outcomes—not just access or opportunities—means that progress on racial equity can be measured in relation to real-world results, not just against program performance standards. Too often, programs are internally consistent, efficient, and effective, and yet fail to improve people's lives. Using a systematic process allows problem-solving one step at a time.

- *Conduct a root cause analysis* as part of the systematic inquiry. Federal equity practitioners and leaders should identify the root causes and drivers of specific racial inequities in their selected priority area. There are different methods for conducting a root cause analysis; GARE members have used graphic tools (e.g., a web or tree) to designate different levels and layers of problem drivers and contributing factors. An iteration of "why" questions can help practitioners drill down and identify underlying causes; however, it is important to recognize that such analysis is as much of an art as a science. It will be helpful to draw on disaggregated data that cuts across different sectors and demographics, but the use of automated data analysis tools to identify drivers can obscure built-in bias and complexities. A thoughtful engagement of impacted communities through participatory, qualitative methods may be more effective than large-scale data analysis. Such engagement can yield direct information on root causes, as well as inform the interpretation of existing data and direct the collection of new data if needed. Community engagement and partnerships will be important throughout the problem-solution-action cycle of a program or project.

- *Develop implementation strategies.* An analysis of specific disparate impacts, burdens, or benefits, combined with an assessment of their drivers, can guide equity practitioners toward developing appropriate implementation strategies. These must include clear metrics for achieving progress and results. Areas of implementation can include service provision, regulation, funding, or any other realm of federal government action. Strategies can be incremental or broad and bold.

Equity practitioners and leaders should be able to distinguish between transactional and transformative strategies. Transactional approaches are limited in scope and do not alter the status quo but can produce short-term benefits for communities of color. Transformative approaches seek to address the root causes of inequities and change cultures and systems accordingly. There is a role for both, as long as transactional approaches are designed as a scaffolding for building toward more substantive change, not as a one-off reform measure.

TRANSACTIONAL APPROACHES
- Issue/sector-based
- Help people negotiate existing systems
- Solutions "transact" with institutions
- Short-term gains for communities, but leave existing systems in place

TRANSFORMATIVE APPROACHES
- Cut across sectors and organizations
- Challenge norms, rules, and cultures
- Alter the way organizations operate
- Shift values, goals, and roles to infuse racial equity

- *Enable learning and replication:* Early initiatives that operationalize a racial equity approach should be designed in a way that enables replicability and encourages learning and uptake by others, within and across agencies. This can be achieved in several ways: First, any project should have robust monitoring and evaluation components. Sharing findings and lessons with other units and agencies can create efficiencies and unlock replication. GARE members have also observed that evaluation and public reporting can be very helpful in building credibility.

Second, a project should include an internal capacity-building component. However small, no project or action should be undertaken in isolation, devoid of organizational change objectives. It is important from the outset to designate resources and responsibilities for follow-up, expansion, and internal integration. Any new tools, processes, and findings can become part of a unit's planning and management processes, rather than staying within the confines of a particular project. This will help guide the infusion of racial equity into other government actions.

Third, a project should specifically seek to integrate racial equity tools and strategies into more permanent procedures, templates, and review protocols. This can prompt internal and external actors to address racial equity as a matter of prescribed routine. For example, racial impact assessments should precede any government action to ascertain how proposed policies, programs, or practices affect different racial groups. Racial equity requirements should be built into discretionary federal grants and requests for proposals. Agencies could adopt a racial equity review process that requires grantees to go beyond formal anti-discrimination mandates and deploy their federal grants to proactively advance racial equity.

EXAMPLE
RACIAL EQUITY IN FEDERAL GRANT PROGRAMS

In 2021, the Department of Transportation's (DOT) Infrastructure for Rebuilding America (INFRA) discretionary grant program added, for the first time, grant criteria relating to racial equity. The DOT could go even further: The program's benefit-cost analysis guidance stated that distributional impacts on different population groups would not affect the benefit-cost evaluation, yet integrating distributional effects into benefit-cost analyses would be a powerful tool for advancing racial equity.

Similarly, the Department of Energy (DOE) recently increased funding for equitable access to solar energy, in response to both the Executive Order on racial equity and the subsequent Executive Order establishing the Justice40 Initiative, which aims to ensure that 40 percent of climate-related investments benefit disadvantaged communities.[12] The DOE grant program included an equity requirement, framed broadly as benefits to underserved communities. As with the DOT, program criteria could be strengthened. The DOE also supports the National Community Solar Partnership to improve equitable access to community solar. While community solar benefits low-income communities, a growth target set by the DOE does not explicitly refer to communities of color.

These examples show that federal agencies are ready to take the next steps toward advancing racial equity. Those steps should include shifting from indirect to direct racial equity goals, integrating explicit racial equity criteria into funding rules, and prioritizing direct investments in communities of color.

12 Recommendations for implementing the Justice40 initiative in a way that meets racial equity goals can be found here: Callahan, Colleen, et al. *Making Justice40 a Reality for Frontline Communities*. Luskin Center for Innovation at the University of California, Los Angeles, September 2021, http://innovation.luskin.ucla.edu/wp-content/uploads/2021/10/luskin-justice40-final-web-1.pdf.

When funding is directly distributed to states, agencies should use their regulatory powers to reduce states' latitude over spending and prescribe racial equity-related uses of funds wherever possible. The federal government could also use this strategy to circumvent increasingly common preemption provisions at the state level.

What are the key challenges?

- Government tends to focus on access provisions rather than outcomes. Yet improving access to services, benefits, or funding, while important, is a strategy for achieving outcomes; it is not the result itself. In fact, it is possible that access to certain programs does nothing to improve outcomes, especially if such programs do not respond to actual needs or fail to account for underlying drivers of inequity. Equity practitioners and leaders should *redirect their units to prioritize community-level outcomes.*

- Racial equity guidance often addresses public services, benefits, and other visible aspects of government operations. However, it is important to **consider the whole range of government functions,** all of which impact racial equity. In fact, the costliest federal policies and programs are also the most invisible ones, and these tend to benefit white people and the well-off the most (e.g., tax exemptions). While agencies may not have much control over such policies, which are based on congressional acts, agencies do decide how to regulate and administer them. For example, agencies could contribute to making such policies and programs more visible and increase transparency about how benefits and burdens fall on different racial groups. Where appropriate, agencies could also reduce participation barriers and conduct outreach to communities of color to increase awareness and access.

- Racial equity practitioners need to be mindful that data infrastructure, data governance, and data integration have not centered racial equity and are likely saturated with biases. Agencies collect large amounts of administrative data, and much of it has yet to be tapped. Equity practitioners will need to identify data needs and data gaps and work with the Equitable Data Working Group set up by the Executive Order to improve the usage of data for racial equity purposes. They should critically examine the rulesets that drive data collection and analysis. Agencies should also shift to a **participatory data governance** model that centers those harmed by problematic data practices and that protects tribal data sovereignty.[13] This will help practitioners question assumptions about what counts as evidence. Evidence-based and data-driven interventions often serve to reinforce, replicate, and automate the existing logic behind patterns of biased decisions, policies, and programs. Practitioners should consider that the best uses of data may not be to discover or prescribe a certain course of action, but to measure progress toward achieving desired outcomes and make the public case for taking action.

- Agencies may find it difficult to step outside an inward-oriented, insular government perspective that is centered on what government does or intends to do. Equity practitioners and leaders should **get a sense of how government actions are being experienced on the ground.** However well-intended, does a government initiative disempower or empower its potential beneficiaries?

13 Nelson, Amy L Hawn, and Sharon Zanti. "A Framework for Centering Racial Equity Throughout the Administrative Data Life Cycle." *International Journal of Population Data Science,* vol. 5, no. 3, 2020.

Questions to ask yourself:

- What is the most meaningful racial equity action you could implement now, given the power and resources you have?
- What type of community engagement could help identify problem drivers and solutions?
- How can you best ensure replicability and build capacity?

EXAMPLE
From Planning to Action: Community Investments Guided by Racial Equity

Multiagency action on racial equity in California illustrates how commitment and planning can translate into reality in a relatively short time. The California Strategic Growth Council (SGC), a multiagency body that coordinates sustainability investment programs, is creating a new model for investments in communities harmed by systemic disinvestment rooted in structural racism. In 2019, SGC adopted a racial equity plan, supported by a partnership with the Public Health Institute (PHI) and GARE, and in the following year, it passed a racial equity resolution that commits SGC and its member agencies to implement concrete actions on racial equity.

One of SGC's flagship investment programs is Transformative Climate Communities (TCC). TCC is partly funded through proceeds from the state's cap-and-trade auctions, which are distributed based on priorities that include equity and environmental justice. TCC invests in disadvantaged communities most affected by pollution and emphasizes community leadership and anti-displacement measures. Since 2018, TCC has awarded over $230 million in grants to 26 disadvantaged communities for local climate resilience strategies that include housing, transit, health, and infrastructure projects. Now, TCC is expanding its investments to what may be the most disadvantaged and disinvested communities in the state: Disadvantaged Unincorporated Communities (DUCs). DUCs are predominantly communities of color that have suffered from historic and systemic disinvestment, racism, and exclusion, akin to the settlements known in border states as *colonias*. DUCs experience high rates of pollution and health disparities, and often lack basic services and utilities. Utilizing a root cause analysis, TCC identified structural racial inequities in DUCs and developed an investment framework—the state's first plan for investing in DUCs. SGC expects this approach to change how state agencies invest in the physical, economic, and social infrastructure needed to lift up communities most impacted by systemic inequities.

TAKING ACTION: THE FUNCTION OF RACIAL EQUITY TOOLS

This guide sets out a framework for advancing racial equity, centered on the key components of visualizing, normalizing, organizing, and operationalizing. These components form a cycle of practice and learning that should be repeated and deepened as this work gains traction and is built out. Racial equity tools can help in this process. They offer useful techniques and facilitate learning, especially during the operationalizing phase. Tools can walk a team through the steps needed to understand and solve problems. At the same time, tools do not provide answers; no tool will tell practitioners what to do. Rather, tools facilitate a process of inquiry that can guide decision-making.

In the past decade, racial equity practitioners in local and state jurisdictions, think tanks, and racial justice organizations have developed and refined a suite of racial equity tools. Most of these tools are publicly available and can be tailored to serve the purposes of federal agencies. The following overview, which explains the purpose and use of tools, is intended to support federal racial equity practitioners and leaders in deciding whether and when to introduce appropriate tools.

What Are Racial Equity Tools and Why Are They Useful?

Tools facilitate a standardized process of inquiry to help practitioners identify and solve problems. They usually consist of a structured series of questions that cast a different light on routine decisions to reveal racial equity challenges. A tool can actively insert racial equity considerations into a decision-making process by questioning assumptions, interrupting standard analytical and planning steps, and introducing a racial equity lens to guide the redesign of policies and practices. Because tools facilitate continuous learning and self-assessment, they are particularly useful as part of organizational change strategies that seek to shift operations and culture. Tools are also ideal for facilitating the replication of processes and practices modeled elsewhere.

How Can Tools Support Federal Agencies in Their Various Functions?

If racial equity is to be infused into all government functions, not just public services, federal equity practitioners and leaders need to examine how these different functions impact racial equity. Tools can help uncover obstacles and opportunities related to racial equity that often remain hidden within various agency functions, including those that arise within federal-state as well as federal and private sector relationships. Below is a list of select government functions, together with sample questions that tools may ask to illuminate racial equity issues.

- **Public services, programs, and benefits:** This area has received the most attention and is addressed by many available tools. However, it is important not to limit the process of inquiry to the issue of access. Rather, tools can help examine several layers of racial inequities in public programs and services, ranging from access to outcomes:

» Many public programs target poor and low-income people, among which people of color are overrepresented. While such programs are essential, they could be far more effective if embedded in universal strategies. For example, in the absence of strategies to limit speculation in the housing market, the goal of increasing housing stability through Section 8 housing vouchers is regularly undermined by rising housing prices that lead to the repeated displacement of low-income renters. Moreover, programs targeting low-income people also tend to have higher levels of administrative burden than those designed for universal use.[14] Additionally, these programs often include punitive elements that, in extreme cases, result in criminalizing their beneficiaries.

A racial equity tool might ask: *What are the burdens and benefits imposed on different racial groups? How is a targeted intervention linked to universal goals and outcomes?*

» Communities of color are rarely involved in program design and decision-making, which reduces the likelihood that programs will meet their expectations, priorities, and needs, and increases the risk that programs will have unintended consequences and prove ineffective. There is also little opportunity for communities to report back on how government programs and services are working on the ground. A community-driven social audit, for example, could help identify service delivery issues.

A racial equity tool might ask: *Who does an agency listen to when planning and designing policies and programs? How does an agency determine whether programs and services reach communities of color and meet their needs?*

» The public programs that disproportionally serve people of color (e.g., TANF, Section 8 housing) are of much lower value than those designed as universal programs (e.g., tax exemptions, Social Security) and have failed to achieve meaningful outcomes (e.g., economic security, housing security).

A racial equity tool might ask: *What outcomes is government seeking to achieve? What programs might be needed to achieve those outcomes?*

- **Resource distribution, funding, and grantmaking:** The federal government wields the power of the purse, yet its demands on state and local funding recipients and other grantees and contractors are often limited to formal compliance requirements. Less attention is paid to achieving results that align with federal policy priorities. Agencies could allow community grantees the flexibility to meet community needs, while holding all funding recipients accountable for advancing racial equity.

A racial equity tool might ask: *Who are the main beneficiaries of government funding? How can federal resources be made more accessible to community-based groups? What outcomes does government funding seek to achieve?*

- **Budgeting finance management:** Equitable resource distribution is at the core of tackling racial inequities, so how federal funds are raised, managed, and spent is highly significant. Agency budgets should be developed using racial equity criteria and should be monitored to assess the racial equity impact of each budget line item. Financial management practices should incorporate equity measurements to better direct and track how budget allocations translate into spending on the ground.

A racial equity tool might ask: *What are the social costs and benefits of different types of public spending? How do items in an agency's budget request advance equitable outcomes? How do financial management processes impede or promote equitable spending?*

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14 OMB emphasized in its equity assessment study that administrative burden exacerbates inequity and suggested an equity-centered burden audit. See: OMB, *Study to Identify Methods to Assess Equity,* op cit.

- **Rulemaking:** The set of rules that implement a law can make a significant difference to a law's impact and outcomes. For example, through rulemaking, the Treasury Department largely controls the flow of funds from the American Rescue Plan Act of 2021. When issuing guidance, it had the power to require the use of COVID-19 recovery funds in ways that prioritize equitable outcomes for communities of color. The department recognized its responsibility to address racial equity, and it opted for measures that indirectly benefit people of color, including a prohibition on using funds to build prisons, and expanded support for public sector hiring and capacity.[15] A more explicit prioritization of racial equity goals could be considered for future rules and guidance. Agencies can also use rulemaking to reduce disproportionate access barriers faced by people of color. They can ease administrative burdens by making enrollment in public programs automatic and coordinated across multiple programs, presuming eligibility, and limiting recertification requirements.

  A racial equity tool might ask: *What are the principles that guide rulemaking? When consulting on draft rules, how can agencies ensure more inclusive and meaningful public participation?*

- **Procurement and contracting:** The federal government provides many of its services through contracts with the private sector, including public-private partnerships. Although anti-discrimination provisions apply, and consideration is given to small and people of color-owned businesses, this is an area where federal agencies could exercise significantly more influence to further a racial equity agenda. Currently, financial criteria, specifically price and cost competition and efficiency, largely determine procurement decisions. Overarching regulation, through the OMB Uniform Guidance procurement standards, limits the substantive bid criteria that state and local governments can deploy when using federal monies on projects. Required cost-benefit or value-for-money analyses do not mandate nonfinancial public interest criteria. The OMB could change that guidance to leverage procurement for the common good, for example, by authorizing consideration of additional criteria, including advancing racial equity, as part of the procurement process. The United Kingdom, for example, has enacted a social value model for procurement, which requires assessing bidders on their contribution to the government's social value priorities, which include reducing inequality.

  A racial equity tool might ask: *Are there access barriers that disproportionately affect small businesses owned by people of color? Are contractors accountable for advancing racial equity?*

- **Workforce development:** As an employer, the federal government must strive for a diverse workforce that reflects the population it serves, including at leadership levels. In the context of the Executive Order, it is of particular importance that agencies invest in recruiting and retaining a workforce that is capable of advancing racial equity. Agencies should also require racial equity skills as a core competency for all staff and appointees and invest in professional development for existing employees to develop this competency. To retain staff with racial equity competencies, agencies should provide a workplace environment that values rather than marginalizes those skills.

  A racial equity tool might ask: *What kind of workforce does an agency need to implement a racial equity agenda? What recruitment and retention policies best respond to a racial equity mandate?*

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15 Department of the Treasury. "Final Rule, Coronavirus State and Local Fiscal Recovery Fund." 31 CFR Part 35 RIN 1505-AC77, January 6, 2022, p. 398.

What Tools Can Do

Racial equity tools are designed to integrate racial equity considerations in government decisions, including policies, programs, practices, and budgets. When used for clearly defined purposes at an appropriate point in the process, and with supportive facilitation, tools can help set an actionable course toward advancing racial equity. Tools can also be invaluable for raising awareness, changing the conversation, training staff, and guiding practitioners to apply their learning and develop solutions.

When tools work well:

✓ Tools can help practitioners question their assumptions, ask new questions, and consider familiar issues from a different perspective.

✓ Tools can demonstrate how racial equity is relevant to a particular workstream.

✓ Tools can shift the focus from performance (e.g., how well, how much) to outcomes (e.g., who is better off).

✓ Tools can point to information and data needs, and they can encourage practitioners to examine existing data more critically.

✓ Tools can help identify racial equity gaps and potential strategies for closing those gaps.

✓ Tools can provide public transparency about the process, goals, and implementation steps of any racial equity initiative.

What Tools Cannot Do

Racial equity tools cannot change cultures and systems by themselves. It is important to build supportive structures and processes to enable the meaningful application of a tool. Tools need champions and facilitators, trainers and learners. This means equity practitioners and leaders should do some internal organizing before introducing a tool. This could include using existing legal and policy mandates as leverage, or instructing the use of a racial equity tool in program planning.

When tools don't work well:

✕ Tools cannot be used as stand-alone devices. They don't work in a vacuum; rather, they need to be embedded in a process of normalizing the values and vision of racial equity.

✕ Tools are not self-explanatory. It is important to arrange for hands-on guidance, support, or facilitation.

✕ Tools are not one-size-fits-all; they should be customized to be effective in different contexts. While a general line of inquiry will be applicable to most governmental contexts, tailor-made questions, along with access to specific data and resources, will be most useful.

✕ Tools are dependent on knowledge, information, and ideas; they help surface, question, and reframe what is already known. Where information is limited, direct outreach to external stakeholders, including communities, may be more appropriate.

✕ Tools can be quite data-dependent. If disaggregated data, controlled for bias, is not readily available, direct engagement with communities should be prioritized.

Overview of Existing Types of Tools and Their Application

Racial equity tools are available for a range of purposes and applications. Below is a sample list of tools, including those derived from GARE's work with local government partners, along with their suggested application.
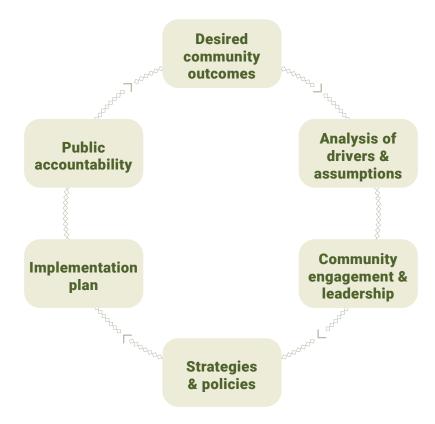
Purpose	Tool	Organization
Equity Assessment	Centering Equity in Collective Impact	Collective Impact Forum
	National Equity Atlas	PolicyLink and USC Equity Research Institute
	For Love of Country: A Path for the Federal Government to Advance Racial Equity	PolicyLink
Planning	Racial Equity Action Plans: A How-to Manual	GARE
	Racial Equity: Getting to Results	GARE
	Race Equity and Inclusion Action Guide	Annie E. Casey Foundation
Organizing	Racial Equity Core Teams: The Engines of Institutional Change	GARE
Participation	The Spectrum of Community Engagement to Ownership	Movement Strategy Center and Facilitating Power
	Community Engagement Toolkit	Collective Impact Forum and Leading Inside Out
Communication	GARE Communications Guide	GARE
Policy Implementation	Equitable Development as a Tool to Advance Racial Equity	GARE
	All-In Cities Policy Toolkit	PolicyLink

For GARE members, GARE's Racial Equity Tool (RET) has been most useful in both normalizing and operationalizing a racial equity approach. This tool is designed to help integrate racial equity into government decision-making processes, including policy, program, and budget decisions. The RET—and its accompanying training materials and worksheet—walks practitioners through a comprehensive series of questions to guide decision-making, starting with desired community-level outcomes. This process can also serve as an applied training, as it introduces users to thinking systematically about racial equity. The RET flips the script by beginning the process of inquiry not at the individual level (e.g., processing privilege or oppression), but with community and societal outcomes. Desired community impact is the driver for change, followed by an exploration of the organizational and operational changes needed to serve that vision.

Specifically, the RET helps to:

✓ Identify measurable outcomes that improve community well-being;

✓ Analyze disparities in current outcomes, along with their drivers;

✓ Engage communities in decision-making processes;

✓ Assess potential implementation strategies for disparate benefits or burdens and unintended consequences;

✓ Design solutions and strategies that best match the desired outcomes; and

✓ Develop mechanisms for implementation and evaluation of impact.

An independent study of how government jurisdictions have used GARE's racial equity tools found that the use of the RET and related tools has directly influenced changes to internal government policies and practices and is associated with the adoption of laws and policies to address systemic racism.[16]

16 Yearby, Ruqaiijah, et al. *Governmental Use of Racial Equity Tools to Address Systemic Racism and the Social Determinants of Health.* Institute for Healing Justice and Equity and the Center for Health Law Studies, October 2021.

CONCLUSION

The United States is at a crossroads. The confluence of major societal challenges—the pandemic, the climate crisis, increasing economic inequality and precarity, democratic decline, and persistent racial injustice—is changing the conditions for governance, policymaking, and public administration. President Biden's Executive Order reflects this historic moment by creating an unprecedented opportunity for advancing racial equity through federal government action.

All public servants should feel emboldened to take up this opportunity. While the Executive Order mandates initial measures, the vision laid out by the president can only be fulfilled if people within government step up to the challenge and develop a shared racial equity practice. This guide offers a framework to support them, based on the experiences of racial equity practitioners and leaders in local and state government.

Advancing racial equity is a long-term endeavor that requires both courage and stamina. But the time for taking meaningful steps is now, as racial inequities risk tearing our country apart. It is the responsibility of government to build a stronger, deeper democracy that brings the values of equity and justice to life.

In 2017, Race Forward united with the Center for Social Inclusion. Founded in 1981, Race Forward brings systemic analysis and an innovative approach to complex race issues to help people take effective action toward racial equity. Founded in 2002, the Center for Social Inclusion catalyzed community, government, and other institutions to dismantle structural racial inequity and create equitable outcomes for all.

Race Forward is home to the **Government Alliance on Race and Equity (GARE)**, a national network of local government working to achieve racial equity and advance opportunities for all. Race Forward publishes the daily news site **Colorlines** and presents **Facing Race**, the country's largest multiracial conference on racial justice.

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