Study to Identify Methods to Assess Equity: Report to the President

July 2021

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The Director of the Office of Management and Budget (OMB) shall, in partnership with the heads of agencies, study methods for assessing whether agency policies and actions create or exacerbate barriers to full and equal participation by all eligible individuals. The study should aim to identify the best methods, consistent with applicable law, to assist agencies in assessing equity with respect to race, ethnicity, religion, income, geography, gender identity, sexual orientation, and disability.

As part of this study, the Director of OMB shall consider whether to recommend that agencies employ pilot programs to test model assessment tools and assist agencies in doing so.

Within 6 months of the date of this order, the Director of OMB shall deliver a report to the President describing the best practices identified by the study and, as appropriate, recommending approaches to expand use of those methods across the Federal Government.

Executive Order 13985, Section 4

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
Washington, DC 20503

July 20th, 2021

Dear President Biden,

On the first great seal of the United States, our founders enshrined a motto that has guided our nation for nearly two and a half centuries—"E Pluribus Unum"—out of many, one. This phrase recognizes that America thrives when all of us thrive.

Our nation has never been bound by geography, ethnicity, or religion, but instead by shared democratic values of liberty, justice, and equality. In this moment of crisis and recovery, comes an opportunity to fully embrace our values and commit to addressing the inequities in our economy and society, and to building a future of prosperity and opportunity that serves all Americans, including those who have been historically underserved.

Your Executive Order 13985 on "Advancing Racial Equity and Support for Underserved Communities Through the Federal Government" calls for a comprehensive approach for the Federal Government to transform itself—for fairness and equity to become more than ideals, to be principles embedded in the daily practices by which the Government serves its people. The Executive Order also outlines a vision of equity that promotes fair and just treatment of all individuals, including those historically underserved, across a range of dimensions from race, gender, and sexual orientation to geography, income, and disability.

Executive Order 13985 calls for the Office of Management and Budget (OMB), in concert with the Domestic Policy Council (DPC), to: support agencies as they assess whether their policies and actions create or exacerbate barriers to equal participation; identify and study promising tools and frameworks to assess equity and assist agencies to test model assessments; and include opportunities to promote equity in the budgets that you submit to Congress. It also calls for the OMB to deliver a report to you, within six months, to describe promising practices identified by OMB's study of tools and frameworks for assessing equity and, as appropriate, recommend approaches to expand use of those methods across the Federal Government.

While there are individual programs that provide a foundation for this work, the Federal Government has never before undertaken a whole-of-Government equity agenda, positioned equity so comprehensively in Administration policy, or committed itself to achieve outcomes that reflect equitable processes. The ultimate goal of your equity agenda is to advance equity and support for underserved communities across the whole of Government and its functions.

Equally important is that no single Executive Order can immediately redress marginalization and disenfranchisement of the historically underserved due to lost opportunity. However, we must face our work with sustained humility and ongoing learning from scientific data and analytic tools to ask more sophisticated questions about inclusion, belonging, and possibility. Systemic bias, including across the Federal Government, can flourish in practices that appear to be neutral on

the surface. We may not notice assumptions in organizational practices that in subtle ways limit possibilities for others. Policies targeted at the poor, for example, may be weighted by higher levels of administrative burden (e.g., complex, opaque, rigid, or repetitive requirements) than services more likely to receive universal use.

Progress towards equity requires both a sprint and a marathon. Agencies mobilized swiftly to meet key milestones in your Executive Order. The equity assessments charged to agencies in the Order required immediate action. The assessments are likely to shine a spotlight on barriers, gaps, and obstructions that routinely affect some, but not all individuals, including communities of color, LBGTQ+ populations, and those living with one or more disabilities. As this study recommends, embedding equity in agency priority goals, learning agendas, financial management, procurement, and strategic planning can prepare agencies for the marathon ahead. Advancing equity further requires long-term change management. It is a difficult realization that Federal agencies have not fully delivered value to all of their constituents. It is disheartening when a data scan reveals results that are at odds with organizational intentions and core national values. And yet, it is only through this ethic of learning and a commitment to evidence that governments become truly able to serve their people.

As called for in your Executive Order, I am pleased to share this report summarizing OMB's study of methods and approaches for assessing whether agency policies and actions create or exacerbate barriers to full and equal participation by all eligible individuals.

Shalanda D. Young
Acting Director, Office of Management and Budget

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Executive Summary

On the first day of the Biden-Harris Administration, President Biden issued Executive Order 13985 on "Advancing Racial Equity and Support for Underserved Communities Through the Federal Government" (the "Order"). The Order outlines a whole-of-Government mandate to advance equity for all Americans through a comprehensive approach to all Government practices, including: management; policymaking (including through regulation and guidance); procurement, contracting, and budgeting; delivery of benefits and services; and data collection, reporting, and use, to tangibly improve the lives of every person across the nation, in particular, those who have been underserved, marginalized, and adversely affected by persistent poverty and inequality.

The Domestic Policy Council (DPC) and the Office of Management of Budget (OMB) are facilitating the cross-Government implementation of the Order. OMB's role includes consulting with agencies on assessments and plans, fostering a learning community among agencies and Executive Office of the President (EOP) components, and conducting a study of equity assessment approaches and tools, the subject of this report.

By August 8, 2021, agencies will complete and submit their equity assessments. This work involves both a "sprint" (to identify equity assessment methods appropriate to core agency services, in consultation with OMB) and a "marathon" (because assessments will identify needs and opportunities for equity-enhancing actions, sustaining programs, and new and updated policies, with a summary of agency next steps due in the form of agency Action Plans that agencies will submit to DPC in January 2022).

OMB's study, obligated by the Order, includes three overlapping and integrated activities: (1) a review of professional expertise relevant to assessments of equity as well as an overview of promising assessment practices; (2) design of initial structures and approaches to guide and support agency equity assessments; and (3) an analysis of equity assessment activities undertaken by agencies at key milestones to support their final equity assessment products.

The findings of this study regarding the available methods for equity assessment include an appreciation that measurements of equity in the Federal ecosystem represent a still nascent body of work in public policy, data science, and organizational change management. A wide variety of assessment tools exist, with many sensitive to the specific context they are evaluating (e.g., inclusive economic development in cities or organizational human resources processes for

EXECUTIVE SUMMARY

recruitment and retention). Some tools focus on measuring access to a benefit or service, while others focus on measuring whether the intended impact of a service or benefit is equitably distributed among beneficiaries. Some approaches focus on stakeholder engagement, while others rely on statistical methods tailored to assess patterns across large-scale datasets collected for multiple purposes.

Given the wide array of agencies, policies, and community needs, this report concludes that multiple, concurrent methods are best positioned to assess equity in Federal contexts. The report also encourages and supports the continued exploration of practices to assess equity.

At present, the most promising practices are those that take into consideration: the historical legacies of disparities; prospective assessment of new interventions; inclusive data initiatives (including methodological innovations to impute missing data values); and methods that address equity in program and service eligibility and assess whether eligible persons, organizations, or communities receive benefit, and why or why not.

This report recommends that agency equity assessments be conducted by assembling cross-functional agency equity teams, including senior leaders. Supported by these cross-functional teams (consisting of staff who engage directly with the public, career staff, agency leadership, and those with expertise in evaluation, data science, information technology, program integrity, financial management, acquisition, human resources, and other operational functions), equity assessments will be more likely to include diverse agency perspectives, have access to available agency data, reflect programmatic and management priorities of the agency, and be positioned to deliver on whole-of-agency innovation. This report also recommends that agencies can best address the requirements of the Order by assessing their high-impact services (for example, services representing the agency's highest dollar spends; services with high volumes of transactions or customers served annually; services that have significant impact on the lives of people, even if smaller dollar value or volume; or those that are specifically designed for historically underserved communities).

The report suggests that sustaining and institutionalizing equity will also require agencies to include equity initiatives in their strategic, administrative, budget, and evaluation plans, including in their agency strategic plans, priority goals, learning agendas, and budget requests and justifications. Fully capitalizing on the catalytic nature of the Order will require investments in ongoing learning and training of the Federal workforce and in hiring and developing key functions and skillsets in the Federal workforce, especially personnel with specialized training in data science, evaluation, human-centered and service design, and equity-focused change management.

Introduction

Throughout our country's history, the Constitution has entrusted the executive branch of the Federal Government to serve and uplift the American people. However, even when the executive branch faithfully attempts to fulfill this mission, we have not consistently reached those promised ideals. The COVID-19 pandemic ("pandemic") exacerbated disparities for too many Americans. The pandemic has had a disproportionate impact on communities of color, which laid bare the impact and consequences of pre-existing structural inequities within the United States. As more data have become available, it is also clear that even within severely affected groups, some have borne a greater burden than others. For example, women of color, especially those who are also essential workers, have been more vulnerable to pandemic-related economic effects, highlighting the importance of an intersectional data lens in assessing equity.

The activities of Federal agencies affect every individual, family, and community across the nation—from the roads we drive on, to the stores where we buy diapers for our children, to the weather data that help farmers plan their week, to the way banks share information about a mortgage a couple is considering for their first home. However, Federal agencies have not always or consistently investigated whether these services are truly accessible and fully deliver intended benefits to all eligible individuals. Our ideals are not realized when, for example, burdensome administrative procedures are required to access Federal programs; when historical policies were explicitly designed to exclude certain populations; when communities do not believe programs or policies meet their perceived needs; and when Federal data systems do not disaggregate data precisely enough to identify which groups benefit from a policy, which groups do not fully receive the benefits to which they are entitled, and why.

Thus, it is imperative that the ways in which our Federal Government makes these decisions—from the design and execution of policy to communications and outreach about programs to evaluations of which policies work for whom—must more deliberately consider all of the nation's people. Every touchpoint—a call center, a county office, a website—between the Government and the public it serves is an opportunity to build trust by delivering the value and competency that all Americans—irrespective of gender identity, race, ethnicity, sexual orientation, religion, disability, income, education, or neighborhood they grew up or live in, or any aspect of who they are—deserve and should be able to expect.

The Order mandates all-of-Government attention to identify and redress obstacles to opportunity, including those with root causes resulting from economic and social disenfranchisement. At our founding and beyond, our new nation has had

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to grapple with the ideal of freedom in the midst of enslavement. The shameful legacies of enslavement, segregation, systemic racism, ableism, sexism, homophobia, transphobia, class bias, nativism, bias against faith, and regional bias remain in our midst. These harms are not just historical; some of these legacies remain in various Government policies and practices. The requirements of this Order create a platform for change that includes the full community of Federal agencies, across the offices, programs, and policies that impact individuals and communities across the whole of our country. This Order establishes rigorous milestones for assessment that will inform budgets, administrative agendas, and program policies to optimize equity in Government for our collective future.

The Office of Management and Budget (OMB) was specifically charged by the Order to:

- In partnership with the heads of agencies, study methods for assessing whether agency policies and actions create or exacerbate barriers to full and equal participation by all eligible individuals and identify the best methods, consistent with applicable law, to assist agencies in assessing equity with respect to race, ethnicity, religion, income, geography, gender identity, sexual orientation, and disability (Section 4);

- Consider whether to recommend that agencies employ pilot programs to test model assessment tools and assist agencies in doing so (Section 4);

- Consult with heads of agencies or designees on conducting an equity assessment of certain programs and policies, to be submitted to the DPC within 200 days of the Order (Section 5);

- Identify opportunities, as directed by the OMB Director, to promote equity in the budget that the President will submit to Congress; and study strategies, consistent with applicable law, for allocating Federal resources in a manner that increases investment in underserved communities, as well as individuals from those communities, reporting on these findings to the President (Section 6);

- Consult with heads of agencies, through the OMB Director, on plans, to address any barriers to full and equal participation in programs (pursuant to Section 5a) and any barriers to full and equal participation in agency procurement and contracting opportunities (pursuant to Section 5b) (Section 7), to be submitted within one year of the Order.

Additionally, OMB is positioned to support all other sections of this Order, including the efforts of the Domestic Policy Council (DPC) (Section 3); engagement with members of underserved communities (Section 8); and support for the Equitable Data Working Group (Section 9).

The Study

An Overview of
Study Approach
and Findings

Overview of Study Approach and Findings

The Federal Government has never before undertaken a comprehensive Government-wide equity agenda. Federal agencies collectively serve as the nation's largest employer, the world's largest buyer, and deliver service missions encompassing individuals, State, local, Tribal, and territorial governments, educational systems, businesses, and industries here in the United States and abroad.

Designing and deploying a Government-wide equity agenda requires agencies to adopt a systematic approach to assessing whether or not their decision-making processes are equitable and ascertaining whether and how Government policies create or exacerbate barriers to full and equal participation in American life. OMB recognizes that agencies will face normative challenges in executing change at this scale. For example, the 24 Chief Financial Officers Act agencies[1] differ in mission, scope, and in the nature of their prior work on advancing equity. What works for one agency may not work for all agencies. In developing processes that are data-driven and collaborative (to include stakeholders and communities), agencies must also craft equity assessment strategies that are tailored to their unique needs, goals, and capabilities. At the same time, the comprehensive equity agenda called for by the Order must be cross-cutting, integrated, and complementary across Government, necessitating alignment across agencies. To accomplish these goals, agencies will need to use the Order as a foundation to develop a common language and a comprehensive vision about equity.

As tasked by Section 4 of the Executive Order, OMB is responsible for studying methods for assessing how agency policies and programs create or exacerbate barriers for equitable participation by all eligible individuals. The Order requires OMB, in partnership with agency leadership, to identify potential methods to assist agencies in their assessments of equity.

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1.   31 U.S.C. § 901, as expanded by the Government Management Reform Act of 1994 and the Homeland Security Financial Accountability Act of 2004. The current CFO Act agencies include the Departments of Agriculture, Commerce, Defense, Education, Energy, Health and Human Services, Homeland Security, Housing and Urban Development, Interior, Justice, Labor, State, Transportation, the Treasury, and Veterans Affairs; Environment Protection Agency; General Services Administration; National Aeronautics and Space Administration; National Science Foundation; Office of Personnel Management; Small Business Administration; Social Security Administration; U.S. Agency for International Development; and U.S. Nuclear Regulatory Commission.

OVERVIEW OF STUDY AND FINDINGS

The OMB study reflected in this report includes three overlapping and integrated activities for learning:

1 Identifying promising equity assessment approaches from a consideration and review of relevant professional expertise (including equity assessment tools, frameworks, and scoring rubrics, through engagement with subject matter experts, review of available tools, and a public Request for Information);

2 Designing initial structures and approaches through which agencies can begin to assess equity in core agency services; and

3 Examining equity assessment actions and pilots undertaken by agencies at key milestones to enhance agency equity assessment reports, to be completed within 200 days of the Order.

Collectively, these study elements will enable and support agencies to further deploy equity assessment methods to investigate the extent to which their policies and programs advance equity; and identify strategies positioning agencies to meet the Order's requirement for agency Equity Action Plans to be submitted by January 20, 2022.

Definitions

For the purposes of the study and this report, OMB is utilizing these definitions set forth in the Order:

- First, the term "equity" means "the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality."

    (We note that Executive Order 14031 on Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders released on May 28, 2021 includes Native Hawaiians, in addition to Asian Americans, and Pacific Islanders.)

- Second, the term "underserved communities" refers to "populations sharing a particular characteristic, as well as geographic communities, that have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life, as exemplified by the list in the preceding definition of 'equity.'"

Findings from a Review of Professional Expertise and Subject Matter Experts

In order to conduct this study, OMB consulted widely, both domestically and globally, with subject matter experts in equity assessment and improvement, data science, and organizational-change management on four topics: (1) Equity Assessment Frameworks, Tools, and Data Analysis; (2) the Role of Administrative Burden in Inequity; (3) Approaches to Expanding Stakeholder Engagement; and (4) Equity and Change Management. The experts OMB consulted provided briefings, identified publicly available research studies, assessment tools, and frameworks, and pointed to a broad variety of other resources. The findings summarized below represent a synthesis of information provided by experts and published research.

Finding

1

A broad range of assessment frameworks and data and measurement tools have been developed to assess equity, but *equity assessment* remains a nascent and evolving science and practice.

Equity assessment represents an expanding though still nascent body of work in public policy, data science, and organizational change management, focused on facilitating the measurement of equity in organizational and government contexts.[2] Collectively, much of the work rests on key principles that appear in different forms across different frameworks. These principles include the importance of understanding the history of disparities in the United States; perceiving the legacy of those disparities in public processes; and cultivating detailed awareness of populations that have been affected by past, as well as current, disparities. A number of frameworks prioritize prospective analyses to identify how populations may be affected in the future by proposed policy interventions. Equity experts recommend gaining this knowledge by ensuring that diverse perceptions and insights are included throughout the policy process, including when policies are designed, implemented, managed, and evaluated. Additionally,

2.   Martin, C. & Lewis, J. (2019). The state of equity measurement. The Urban Institute. https://www.urban.org/sites/default/files/publication/101052/the_state_of_equity_measurement_0_0.pdf

FINDING #1

assessments consider whether barriers to access exist (whether or not the process for eligibility, application, or receiving the benefit is itself exclusionary, including with respect to the level of administrative burden beneficiaries incur). The most comprehensive equity assessments look beyond equitable access and seek to identify disparate impacts, whether intended or unanticipated. Equity assessment processes that collectively address these principles enable organizations to identify where prior initiatives succeeded in closing gaps, gaps that remain, and new challenges. All of these can then be incorporated into the strategic priorities, goals, and learning agendas that Federal agencies devise as part of their existing planning processes.

A number of specialized equity assessment tools and toolkits are available from different sources. Assessment tools can be used to support equity assessments at various levels, including department, agency, component, program, service center, or geographic region. Some are simple discussion-support tools to structure early-stage processes, while other discussion-support tools can be integrated into strategic planning processes. Several tools produce an "equity score" or the ability to assign a value that compares how successfully a program, policy, or legislative agenda applies an equity perspective or lens, often focused on racial equity. As noted above, equity tools also vary in their targets, with some centered, for example, on assessing access to an opportunity, while others track whether beneficiaries achieved expected outcomes.

Some promising tools for equitable policy assessment include "microsimulations." A microsimulation uses algorithms to simulate the impact of one or more Government programs on individual persons in a group, household, or community.[3] A "dynamic" microsimulation can synthetically advance a population decades into the future by adding demographic and economic information (for example, births, deaths, employment, retirement, etc.), year by year, person by person; and can then analyze the computer-aged population. "Static" models focus on the immediate past, the current present, and the near future. A static model can illustrate the impact of different Government programs on persons and populations.

However, the accuracy of microsimulation methods and other data-centric tools depends on data-collection procedures with the capacity to responsibly disaggregate the characteristics of different groups (e.g., to include, as noted in the Order, Black, Latino, Indigenous and Native American persons, Asian Americans and Pacific Islanders, and other persons of color; members of religious minorities; lesbian,

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3.   *Microsimulation*. (n.d.) The Urban Institute. https://www.urban.org/research/data-methods/data-analysis/quantitative-data-analysis/microsimulation

FINDING #1

gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; persons otherwise adversely affected by persistent poverty) and other sub-groups (such as women and girls). While many agencies may have an abundance of administrative data (data that results from the administration of Federal programs and services), many agencies report that they do not yet have structures, processes, or mechanisms to deploy that data for purposes of assessing equity.

DEEP DIVE

Tools Provided by Subject Matter Experts

As part of this study, OMB is identifying equity assessment tools, resources, and leading practices. In briefings and informational meetings hosted by OMB, a number of external and internal subject matter experts shared assessment and scoring tools they had authored, researched, or observed in practice.[4]

Further, OMB issued a Request for Information (RFI) (Fed. Reg. 24029 (May 5, 2021) and opened a 60-day response period in order to maximize the opportunity for public participation. This timing did not allow for a full review of RFI responses in advance of the completion of this report, though OMB will continue through Summer 2021 building a thorough compendium reflecting what is shared and learned from this RFI. Submitted materials that address the components of the RFI will be reviewed, curated, and made available to agencies. Following the close of the RFI, and after an analysis of the submissions, OMB will brief agencies on additional equity assessment tools and other materials identified in RFI responses.

Framing and Preparation Tools

🔗 **Framework for Assessing Equity in Federal Programs and Policies (MITRE Corporation)**

This 31-page equity assessment tool seeks to provide a comprehensive approach for a systems-based, data-driven approach that incorporates equity, human-centered research, design, and assessment practices currently in use in U.S. and global contexts. This framework has been tailored for use by

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4.   An illustrative set of tools are previewed here for informational purposes only, and OMB did not undertake an empirical assessment of the effectiveness of these tools. Inclusion of tools developed by individuals and organizations external to Government does not imply endorsement.

DEEP DIVE: TOOLS

Federal agencies and provides step-by-step guides on how to stand up an equity assessment process (under time-constrained conditions) and reflect program outcomes and agency resources. It also includes actionable next steps to help agencies prepare for the implementation planning phase that will follow the assessment.

🔗 **Racial Equity: Getting to Results (Government Alliance for Racial Equity)**

This 20-page equity framework is focused on equity-centered, results-based accountability and describes an approach to equity based on performance measures, data mining to understand the "story" of people and places, and opportunities for working with partners to advance equity.

🔗 **Racial Equity Impact Assessment (Race Forward)**

This 3-page compact tool consists of a question guide to help users to anticipate and assess consequences of proposed actions on different racial groups.

🔗 **City Leader Guide and Workbook on Equitable Economic Development (Bloomberg Harvard City Leadership Initiative)**

This guide was designed to help city leaders translate their commitment to economic equity, inclusive growth, and racial justice into action, especially in the context of imperatives identified during the pandemic. The guide features diagnostic tools to assess the organizational readiness of city hall and to identify economic opportunity equity gaps; guidance on setting meaningful goals and benchmarks, and developing relevant metrics; and an overview of promising practices in equitable economic development from around the country. Although this guide is for municipal leaders, its guidance on goals and benchmarks, in particular, could be adapted to Federal policymaking.

Assessment Tools

🔗 **Community Resilience Estimate (United States Census Bureau)**

This tool measures risk factors to the Census block level, including those that are relevant to the social and economic impacts of pandemics, natural disasters, etc.

DEEP DIVE: TOOLS

🔗 Opportunity Atlas (United States Census Bureau, Harvard University, Brown University)

This tool is based on a comprehensive Census tract-level dataset of children's outcomes in adulthood uses data covering nearly the entire U.S. population. For each tract, estimates are made of children's outcomes in adulthood such as earnings distributions and incarceration rates by parental income, race, and gender. These estimates enable researchers to trace the roots of outcomes such as poverty and incarceration to the neighborhoods in which children grew up.

🔗 Racial Equity Geographic Information Systems [GIS] Tools (ESRI)

This collection of maps, datasets, tools, and guidance was designed to allow users to engage GIS to understand racial equity in communities as a basis for making more equitable decisions about interventions and resource allocation. GIS provides insight into patterns of inequality and can provide common understanding across communities to affect positive change.

🔗 Spatial Equity Tool (Urban Institute)

This application uses multiple spatial datasets to track place-based equity in cities over time. Users can upload their own data. The tool geocodes the dataset to a U.S. city and compares the distribution of the uploaded data with the distribution of baseline variables from the American Community Survey. Similar tools could be created for data with a race and ethnicity variable to scale measurement of impact across Government.

Impact Tools

🔗 Transfer Income Model [TRIM3] (U.S. Department of Health and Human Services)

This microsimulation tool is designed to simulate over a dozen different programs—including cash assistance programs, nutrition benefits, other in-kind benefits, Government-provided health insurance, payroll taxes, and Federal and State income taxes and tax credits—and captures State-level policy variations, as well as cross-program interactions. The model can be used in two ways: to examine how programs are currently affecting the economic wellbeing of American families; and to test what would happen (to program eligibility, program costs, tax liability, and so on) if policies were changed.

DEEP DIVE: TOOLS

Immediately upon embarking on the design of their equity assessment approach, agencies faced challenges in the availability of data about the personal characteristics of their program participants needed to understand differences in inclusion, service, and benefits. The Equitable Data Working Group (EDWG), established under the Order, has been charged with studying and providing recommendations for addressing inadequacies in Federal data collection programs, policies, and infrastructure for assessing equity. Pursuant to the Order, the EDWG is consulting with agencies to understand the barriers that they face in conducting their equity assessments, facilitate the sharing of information and practices to increase equitable data collection, access to such data, and enhance cross-agency data sharing and will produce a forthcoming set of recommendations to the Assistant to the President for Domestic Policy.

DEEP DIVE

Using Data to Assess Equity

Thus far, the EDWG has categorized three common barriers agencies often encounter in conducting equity assessments, to guide the focus of their efforts, which their forthcoming report will address.

Underutilized data

In some instances, agencies may have the data needed to answer a question or respond to an equity issue, but barriers to its use may be so significant that it is underutilized. One strategy for advancing equity is for agencies to identify opportunities to increase access to and use of existing Federal data to understand how programs, services, and operations are distributed across underserved groups. Where possible and practical, agencies can consider data sharing to create datasets needed to answer questions relevant to equity. However, there are technical challenges to data sharing, especially with data that have been collected in a variety of different forms in keeping with agency imperatives. A different set of challenges exist with respect to agency cultures. The policies and procedures within agencies that make data sharing difficult may have been originally implemented for affirmative reasons, e.g., to ensure privacy. To develop and implement new data-sharing practices will require agencies to understand the prior justifications for protections, engage with communities before policies are modified, and demonstrate the value that arises when data sets can be aggregated and layered.

DEEP DIVE: DATA

Inaccessible data

Access to some data are restricted by statute, and access to others can only be made available in restricted access environments in order to avoid compromising citizens' privacy. The EDWG has initiated several projects designed to responsibly promote data sharing and matching, to the extent permitted by law, to create datasets needed to answer relevant questions. Furthermore, agencies are developing promising methods for making restricted access more accessible to stakeholders.

Missing data

In some cases, data needed to answer a question or respond to an issue do not exist at all, or currently only exist at a very low quality. For example, data may be collected by race and gender but not, for example, in ways that enable research at the intersection of race and gender (e.g., examining the impact of a policy on those who are Asian-American and also identify as women). There may be extant legal, regulatory, or resource reasons for not collecting certain kinds of information, including disaggregated data. In other instances, Federal program applications have not traditionally asked about demographic characteristics that are not necessary for deciding program eligibility in order to reduce the perception of discrimination. The willingness of people to disclose certain demographic information about themselves or their families may reflect the extent of their trust in the government program or agency asking for this information. Where trust is low, information response may be truncated. This is also another potent reminder that technical tools for data collection and protection must be deployed in combination with community understanding to advance equity. As another example, Federal statistical surveys of nationally-representative populations often do not have sufficient sample sizes to understand more geographically-specific (e.g., rural, urban, neighborhood, etc.) experiences. In these instances, Local and State data may illuminate the experiences of underserved populations, such as rural communities that currently are not otherwise captured in Federal surveys.

Finding
2

Administrative burden exacerbates inequity.

The onerous experiences that individuals and entities can encounter when trying to access a public benefit are known as "administrative burdens."[5] These burdens include time spent on applications and paperwork, but also factors like time spent traveling to in-person visits, answering notices and phone calls to verify eligibility, navigating web interfaces, and collecting any documentation required to prove eligibility. Research indicates that where there are administrative burdens, they do not fall equally on all entities and individuals, leading to dispro-portionate underutilization of critical services and programs, as well as unequal costs of access,[6] often by the people and communities who need them the most.[7] Burdens that seem minor when designing and implementing a program can have substantial negative effects for individuals already facing scarcity.[8] Although universal interventions that focus on mitigating administrative burden may increase equity, assessments of equity that focus on the differential impact of certain administrative burdens may specifically advance equity for those the Order prioritizes. A fundamental "leading practice" that must be scaled Government-wide is the completion of administrative burden audits that can identify points resulting in drop-off, and in particular, increased drop-off among sub-groups.

5.   Burden, B. C., et al. (2012). The effect of administrative burden on bureaucratic perception of policies: Evidence from election administration. *Public Administration Review,* 72(5) 741-751. www.jstor.org/stable/41687989. Under the Paperwork Reduction Act, the Federal Government slightly more narrowly defines "burden" as the "time, effort, or financial resources expended by persons to generate, maintain, or provide information to or for a Federal agency." This report uses the terms "administrative burdens" and "paperwork burdens" interchangeably to capture the full impact on the public of fulfilling an information collection request.

6.   For a review of some of the associated literature, see Deshpande, Manasi, & Yue Li. (2019). Who is screened out? Application costs and the targeting of disability programs. *American Economic Journal: Economic Policy,* 11(4), 213-48.

7.   Herd, P. & Moynihan, D.P. (2018) *Administrative Burden: Policymaking by Other Means.* Russell Sage Foundation. www.jstor.org/stable/10.7758/9781610448789

8.   Mullainathan, S. & Shafir, E. (2013.) *Scarcity: Why having so little means so much.* Henry Holt and Company.

FINDING #2

While some programs have had success in simplifying administration of benefits programs over time (such as the move from paper "food stamps" to electronic benefit transfer cards and other programmatic innovations in the Supplemental Nutrition Assistance Program),[9] many processes still include substantial administrative burdens, which is often indicated by low program take-up, lengthy waits for navigational support, or paying third-parties for support. For example:

- In 2019 the average wait time at the Social Security Administration (SSA) toll-free phone number was over 20 minutes,[10] the average wait time at an SSA field office was almost 30 minutes,[11] and over 10 percent of the time a call to an SSA field office would go unanswered;[12]

- During the Great Recession, Black and Hispanic workers were less likely to receive unemployment insurance benefits than white workers;[13]

- Parents of children with disabilities report accessing services for their children as a major source of stress;[14] and

- Last year, more than 14 million low-income Americans paid for private tax filing services when they could have filed their taxes for free if they had successfully navigated a confusing and overly-complex Government program overseen by the IRS.[15]

9.	Ganong, P., & Liebman, J.B. (2018). The decline, rebound, and further rise in SNAP enrollment: Disentangling business cycle fluctuations and policy changes. *American Economic Journal: Economic Policy,* 10(4), 153-176.

10.	Social Security Administration. (2021). *Social Security Administration (SSA) monthly data for national 800 number network.* Retrieved July 1, 2021 from https://www.ssa.gov/open/data/800-number-average-speed-to-answer.html

11.	Office of the Inspector General. (2018). *Customer wait times in the Social Security Administration's field offices. Social Security Administration.* Retrieved July 1, 2021 from https://oig.ssa.gov/sites/default/files/audit/full/pdf/A-04-18-50260.pdf

12.	Social Security Administration. (2021). *Social Security Administration (SSA) monthly data for field office telephone services: National answer & busy rates.* Retrieved July 1, 2021 from https://www.ssa.gov/open/data/FO-Answer-Busy-Rate.html

13.	Nichols, A. & Simms, M. (2012). *Racial and ethnic differences in receipt of unemployment insurance benefits during the Great Recession.* The Urban Institute. Retrieved July 1, 2021 from https://www.urban.org/sites/default/files/publication/25541/412596-Racial-and-Ethnic-Differences-in-Receipt-of-Unemployment-Insurance-Benefits-During-the-Great-Recession.PDF

14.	Thorin, E.J. & Irvin, L.K. (1992). Family stress associated with transition to adulthood of young people with severe disabilities. *Journal of the Association for Persons with Severe Handicaps,* 17(1), 31-39. doi:10.1177/154079699201700107 via *Administrative Burden* p. 27.

15.	Kiel, P. and Elliott, J. (2020). TurboTax and others charged at least 14 million Americans for tax prep that should have been free, audit finds. *ProPublica.* Retrieved July 1, 2021 from https://www.propublica.org/article/turbotax-and-others-charged-at-least-14-million-americans-for-tax-prep-that-should-have-been-free-audit-finds

FINDING #2

The pandemic highlighted the immense public costs of not being customer-focused when designing and implementing public benefits programs. In the early months of the pandemic, for example, State unemployment insurance systems were overwhelmed with demand, delaying or preventing access to essential benefits for millions of Americans.[16] Similar ordeals were imposed on many Americans during the early phases of vaccine deployment, when complicated screener questionnaires and documentation requirements especially left many eligible elderly Americans frustrated and unable to sign up for vaccine appointments in a timely fashion, sometimes after navigating dozens of web pages.[17]

Experts in administrative burden analysis note that examples like these reflect a confluence of policy and design choices.[18] These decisions represent trade-offs and are likely driven by real and perceived constraints related to resources, capacity, urgency, and program integrity. Although any additional hurdle in an application process can lead to drop-off in program participation, many administrative burdens arise out of important and legitimate efforts to ensure that individuals are eligible for the benefits to which they are applying and to ensure compliance with Federal regulations.[19] Others may arise from State, local, Tribal, and territorial policy decisions regarding how to administer programs locally. Identifying, analyzing, and reducing burdens often implicates a complex web of resource, personnel, and, at times, statutory constraints.

To verify eligibility and ensure payment accuracy, agencies may require applicants and participants to provide information or complete tasks to verify compliance with program or statutory requirements. Many controls, such as identity verification, are essential to protect the depletion of funds caused by error, fraud, waste, and abuse. Agencies must, however, balance effective stewardship over the total funds allocated to those in need with individuals' full and equal participation. Financial mismanagement of funds aimed at benefiting

16.   Solon, O. & Glaser, A. (2020). A "perfect storm" for chaos: Unemployment system's failures were a long time coming. *NBC News*. Retrieved April 26, 2021 from https://www.nbcnews.com/business/business-news/decade-neglect-has-caught-u-s-unemployment-offices-n1205056.

17.   Goldman, H. & Banjo, S. (2021). "NYC's complex and confusing vaccine sign-up baffles the elderly." *Bloomberg News.* Retrieved April 26, 2021 from https://www.bloomberg.com/news/articles/2021-01-11/nyc-vaccine-sign-up-process-is-bewildering-comptroller-says.

18.   Herd, P. & Moynihan, D. (2018). Administrative burden: Policymaking by other means. *Russel Sage Foundation.*

19.   See the direct discussion in the Finding 5 section below on the tradeoffs between program integrity and streamlining application processes.

FINDING #2

underserved communities would also constitute an inequitable outcome. And failure to deliver Federal funds in an equitable manner consistent with congressional intent is a form of mismanagement. These trade-offs must be acknowledged and investigated. However, previous government-sponsored and academic studies confirm that contrary to expectation in many instances, reductions in burden do not necessarily increase improper payments. In fact, burden reduction may actually improve overall financial management. Agencies have, in some cases, reduced requirements by shifting eligibility checks to the Government by leveraging existing data, by automating processes, or by using alternative, and potentially even more accurate, sources of information.[20]

When agencies work to mitigate administrative burden, their efforts can significantly enhance their ability to comprehensively advance equity, meet the needs of underserved communities, and improve operational efficiencies. This might take the form of agencies conducting a "burden audit" with an emphasis on equity. For example, experts in reducing administrative burden suggest that agencies could conduct a burden or "sludge" audit to identify which burdens most affect their most vulnerable stakeholders.[21] This work might include working with and across Federal entities like the United States Digital Service (USDS), Office of the Federal Chief Information Officer (OFCIO), Office of Federal Financial Management (OFFM), Office of Information and Regulatory Affairs (OIRA), the Federal Customer Experience Team in the Office of Performance and Personnel Management (OPPM), and the OMB Evidence Team, as well as the Office of Evaluation Sciences and the Technology Transformation Service at the General Services Administration, among others. The focus of a burden audit could include piloting burden-reduction "sprints" or a time-limited iteration of focused work, in this case, addressing key barriers in specific application processes and offering recommendations for immediate, medium-term, and long-term actions to reduce burden; designing rapid-cycle evaluations to determine the extent to which burden-reduction "sprints" achieved their desired aims; and identifying opportunities where Federal input to State, Tribal, and territorial governments administering programs might streamline processes or otherwise reduce administrative burden.

20.   For example, https://www.occ.treas.gov/news-issuances/news-releases/2019/nr-ia-2019-142.html and https://www.healthit.gov/sites/default/files/page/2020-02/BurdenReport_0.pdf. Also: Finkelstein, Amy and Matthew Notowidigdo. (2019). "Take-Up and Targeting: Experimental Evidence from SNAP." *Quarterly Journal of Economics* 134(3): 1505-1556.

21.   Sunstein, C. (2020). Sludge Audits. *Behavioural Public Policy,* 1-20.

FINDING #2

Meaningfully altering the level of burden experienced by the public may require regulatory reform and program-integrity actions, as well as resource commitments, attention to program design, modernization of information technology, data-sharing arrangements to reduce reporting requirements on the individual, and stake-holder engagement, among other steps. With these considerations, mitigating administrative burden is a core strategy for advancing equity.
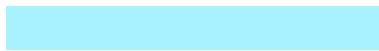
DEEP DIVE

Tackling Administrative Burdens

Through its Equity Learning Community, OMB has developed resources to guide agencies on how to begin to consider reducing administrative burden as a key tool to improve equity and experience for all Americans. Preliminary considerations are outlined in the table below. In some cases, there may be a strong body of evidence and research to support a particular means of easing burden. In other cases, agencies may need to undertake research and evaluation in order to identify whether particular strategies are effective means of easing burdens while also maintaining program integrity.

Opportunity Area to Improve Equity	Known Burden Drivers	Potential Solutions
Reducing form complexity and improving comprehensibility	• Lengthy forms and instructions driven by legal design requirements. • Questions that cannot be answered based purely on an applicant's own memory or knowledge about themselves. • Multiple or supplemental forms during a single application experience. • Eligibility requirements that are overly complex and not well known.	• Ensure that all instructions and notices are written in plain language[1] and translated into multiple languages. • Adopt principles of human-centered design (e.g., early and routine user interviews and A/B testing to continually refine design and language). • Provide step-by-step examples of process involved in claiming benefits, accessing protections, or navigating a service.

Citations within the table are located at the end of the report.
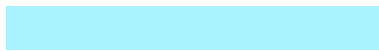
DEEP DIVE: ADMIN. BURDENS

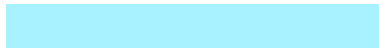| Opportunity Area to Improve Equity	Known Burden Drivers	Potential Solutions
Reducing form complexity and improving comprehensibility	• Questions that ask for information substantially similar to information the applicant has likely provided to the agency previously, or to another agency previously.	• Conduct pipeline analyses to identify drop-off points of various channels (Web, phone, paper/in-person) and submission processes. • Provide navigators or field staff who can support the applicant across the experience of applying for the program.[2] • Systematically and routinely use screeners or data-matching to notify individuals of benefits they are likely entitled to.[3] • Provide calculators to estimate benefits (if applicable). • Develop program defaults to opt beneficiaries in to automatic enrollment.[4] • Systematically and routinely use data-matching to prefill applications or administratively verify information for prospective beneficiaries. • Leverage categorical eligibility to enable minimally burdensome enrollment for individuals who have already demonstrated eligibility for other benefits programs with similar requirements.
Minimizing costly (in terms of both time and money) documentation requirements	• Requirements for third-party documentation. • Questions requiring responses from, or coordination with, third parties. • Questions that cannot reasonably be answered while relying only on documents readily accessible in the respondent's home. • Documentation requirements involving fees or other financial impositions to access.	• Allow for respondent self-attestation or self-allegation in areas that currently require evidence or documentation.[5] • Shift the burden involved in developing evidence or external documentation necessary to prove eligibility from the applicant to agency personnel. • Allow for streamlined enrollment coupled with post-enrollment verification of eligibility.

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Opportunity Area to Improve Equity	Known Burden Drivers	Potential Solutions
Minimizing costly (in terms of both time and money) documentation requirements	• Identity proofing requirements that are challenging to meet for certain communities. • Processes known to involve a meaningful subset of applicants seeking support from third-parties, such as advocacy organizations or legal counsel.	• Provide navigators who can support the applicant across the experience of applying for the program, to include support with developing necessary identity proofing.[6]
Streamlining processes	• Processes requiring travel as an element of applying for this program. • Processes where applicants need to take off work or locate childcare to complete transaction requirements. • Programs where the applicant may need immediate access to benefits or may be navigating a moment of crisis. • Processes that involve the applicant transacting with or moving between multiple offices or agencies (either Federal, State, or local). • Substantial differences or inconsistencies in how different States or localities administer the program. • Idiosyncratic submission requirements, such as requiring ink-based signatures or original records when copies would suffice. • Frequent recertification.	• Shift in-person interview requirements to telephone or video-teleconference. • Ensure at least two equally accessible means of applying for the program (one of which should be a mobile-responsive web-based application). • Ensure consistent wait times (and call-back option for greater than 5-minute wait times on the phone) for applicants when they call the agency or visit in-person. • Provide live agents who are available to support applicants outside of normal business hours. • Allow for retroactive enrollment or point-of-need enrollment (e.g., health care enrollment at the hospital). • Structure business processes so that applicants can receive channel-neutral support regardless of the office with which they conduct transactions. • For State or locally administered or adjudicated programs, develop consistent minimum standards for questions and processes. • Eliminate ink signature requirements where not required by statute and allow for copies (digital or physical) of documentation absent a demonstrated adjudicative need for original records.

DEEP DIVE: ADMIN. BURDENS

Opportunity Area to Improve Equity	Known Burden Drivers	Potential Solutions
Streamlining processes		• Prefill recertification forms with known information (e.g., administrative data) about the beneficiaries (particularly those unlikely to have experienced significant changes in their living situation) to facilitate simpler recertification processes. • Highlight deadlines and consider framing effects (e.g. expressing deadlines in hours instead of days).[7] • Give people ample time and opportunities to respond, reviewing recertification timelines and opportunities to extend.[8][9] • Help people to make an action plan using action language and planning prompts. [10] • Lengthen time between recertifications.[11]
Improving communication	• Lengthy notices or notices that are written in languages that target audiences do not use or understand. • Sending only a single notice before taking action. • Sending notices exclusively by mail.	• Ensure notices are written in plain language[12] and are designed with human-centered design best practices (such as prioritizing key information in headings, text boxes, and bold text; avoiding over-including information not relevant to the immediate task at hand).[13] • Deliver communications through a trusted source, and utilize outreach campaigns and partnerships with trusted community organizations.[14] • Develop improved communication strategies, to include systematically and automatically tracking and following up with unresponsive applicants or beneficiaries. • Proactively work to maintain accurate contact information for program participants.

DEEP DIVE: ADMIN. BURDENS

Opportunity Area to Improve Equity	Known Burden Drivers	Potential Solutions
Improving communication		• Systematically and routinely send communications and notices via multiple modalities (e.g., mail, email, text messages, phone calls).[15] • Allow applicants the ability to select preferred modes of communication. • Provide timely reminders considering season, day of week, timing of day that is most relevant for the target audience.[16] • Conduct specialized, proactive outreach to individuals who may be unlikely to respond to typical notices, such as individuals who do not speak English as their native language, individuals with vulnerable housing situations, or individuals with certain cognitive impairments. • Tailor notices to specific needs of different customer segments, provide personalized information, and offer individualized feedback and peer comparisons when relevant.[17] • Ensure beneficiaries have on-demand, self-service access to their account, including applications or other records that may be relevant to future interactions with the agency.

Finding
3

The Federal Government needs to expand opportunities for meaningful stakeholder engagement and adopt more accessible mechanisms for co-designing programs and services with underserved communities and customers.

Governments have traditionally invited citizen and stakeholder engagement to facilitate good governance, to develop trust in—and legitimacy of—government actions, to gauge the effectiveness of public policies, and towards accountability to community needs. Over time, stakeholder engagement has evolved into an even more vital tool to identify urgent problems and innovative solutions, inform and shape decision- and policy-making, and create deeper collaborative relationships between policymakers and communities. Stakeholder engagement has been redesigned to demonstrate that communities can be collaborative co-creators of public and private value, reflecting the *of, by,* and *for* philosophy that President Abraham Lincoln spoke of.

As indicated earlier in this report, community-engaged methods are among the core principles undergirding equity assessment. Various forms of community-engaged methods to support equity assessments exist, from formal institutional community advisory boards, to public dialogue and deliberation forums, to early phase co-design and usability workshops. All are premised on the belief that community members have unique, valid, and valuable perspectives and expertise about the problems and barriers interventions are designed to address. Stakeholder engagement has become a critical resource for defining relevant problems and for crowdsourcing innovative solutions from those closest to the problem or opportunity.

Many Federal agencies already conduct stakeholder engagement processes (including notice-and-comment sessions, town halls, forums, requests for information, and other forms of public engagement). However, these efforts are too often perceived by stakeholders and agencies alike as being siloed, inaccessible, or irrelevant compliance exercises with unclear purpose or benefit to communities, demonstrating insufficient consideration of the needs, interests, and priorities of diverse populations.

For stakeholder engagement to be truly equitable—and thus to be a source of actionable advice and provide evidence about equitable outcomes—experts across a broad swath of community-engaged methods recommend that agencies

FINDING #3

consider systemic barriers to access and to the disparities of voice and power that shape the ability of different stakeholders to engage in consultation and participatory processes with Government. Open principles of transparency, public notice, and usability are necessary, but they may simply be insufficient, particularly when the goals of engagement include understanding granular barriers and building deeper collaborative relationships with underserved communities. These challenges are especially notable for the most difficult-to-reach and historically marginalized community members.

Underserved and marginalized communities may also require more segmented and specific strategies for outreach and engagement. Experts recommend strategies that include engaging community intermediaries who are trusted, culturally specific messengers, and accessible, relevant channels for engagement. Additionally, forums, listening sessions, consultation, and other forms of engagement need to be tailored to fit the specific circumstances that communities face to make participation a realistic option. A listening session scheduled in the middle of a weekday, for example, is not likely to attract participants employed in settings where they do not have the flexibility to rearrange their work schedules to attend. Likewise, meaningful communications channels will differ in rural and urban settings or different regions of the country. Technology may be a solution in some instances and a barrier in others, especially those without broadband access or at "the last mile," with only a basic cellphone and limited data plans.

Stakeholder engagement is most likely to yield participation when the issues on which engagement is invited include real stakes that are placed on the table for genuine discussion and debate.[22] *Pro forma* or surface-level consultations will not build trust and are unlikely to generate meaningful engagement. Instead, engagement must be connected to tangible outcomes and decisions that community members recognize as consequential.

However, even as inclusive engagement can be a force multiplier and build on itself, the expansion of community voices may also bring, for example, new layering to the policy design process. Communities and Federal agency teams are, for example, likely to have different ideas about how to make policies and procedures more equitable. Further, different constituencies within the

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22.   See, for example, Farrell, L. et al (2021). *Community voice is expertise.* The Urban Institute. Retrieved July 7, 2021 from https://www.urban.org/urban-wire/community-voice-expertise and Irby, M. et al. (2021). *Community-engaged research: Common themes and needs identified by investigators and research teams at an emerging academic learning health system.* Retrieved July 7, 2021 from https://www.mdpi.com/1660-4601/18/8/3893.

FINDING #3

same community may prioritize a range of possible outcomes and methods to advance equity. When principles of engagement and participation are folded into substantive policy design, the number of choices and trade-offs may increase. Experts in community-engaged methods stress that navigating decision points like these with respect and recognition of diverse community perspectives yields more robust policies and programs and delivers better outcomes.[23]

Experts in human-centered design, including those internal to Government (e.g., the Federal Customer Experience Team, USDS, and the Lab at OPM) highlight the importance of regularly reviewing stakeholder engagement practices, especially to identify communities and voices that are not yet at the table and, where necessary, devise methods to invite their participation. Asking of a service or a program, "for whom am I designing?" allows a designer to consider those they may have omitted. Where disaggregated data is not readily available, well-designed stakeholder engagement can help identify perspectives that might otherwise remain invisible. "Customer segmentation" is the process of separating the target population of a program, service, or policy into smaller, more well-defined segments based on certain factors (e.g., demographics, location, income, or interests). Creating engagement opportunities for different segments makes it possible for agencies to understand distinct challenges that different groups are likely to experience. It also allows policy and program designers to customize some service offerings. When service users recognize that a service addresses their specific concerns, this can build trust.

Given the wide array of agencies, policies, and community needs, this study concludes that there is no one-size-fits-all approach to stakeholder engagement. Different strategies are not mutually exclusive. Different program and policy initiatives may require agencies to deploy multiple strategies at the same time. The approach chosen should match the need and purpose, and it should be relevant to the community. As with mitigating administrative burden, this study supports the importance of quality, inclusive stakeholder engagement as a core strategy to advance equity.

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23.   Ibid.

DEEP DIVE

Stakeholder Engagement Activities

OMB has identified multiple stakeholder engagement initiatives across the Executive Office of the President and in Federal agencies that demonstrate how stakeholder engagement can shape an understanding of what people need from Government:

Since 2018, the Federal Customer Experience Team has [conducted three cross-agency journey-mapping efforts](#) to collect feedback from communities not through a specific agency scope, but rather organized around a life event: surviving a natural disaster, a child with a disability transitioning to adulthood, and a Service member seeking civilian employment for the first time. Through this effort, they brought together staff from more than a dozen agencies to conduct focus groups and more than 150 interviews with individuals that were currently navigating these events across not only multiple Federal agencies, but also multiple levels of government. As a result, agencies were able to identify moments that matter most to actual people, rather than selecting priority areas aligned to internal Federal workstreams.

The Federal Customer Experience Team has [aggregated and analyzed transactional feedback surveys across more than 20 Federal programs](#) after requiring that designated High Impact Service Providers (HISPs) collect customer feedback (many for the first time) in OMB Circular A-11 Section 280. This data has begun to demonstrate that efficiency expectations drive overall satisfaction, well-designed mobile sites drive better digital experiences, and that human interaction matters more in person than by phone. In order for HISPs to make smart investments in improving their service delivery, they need data on where those dollars matter most to the customers they serve.

The National Institutes of Health's (NIH) [Community-Based Participatory Research Program](#) (CBPR) supports collaborative interventions that involve scientific researchers and community members to address diseases and conditions disproportionately affecting health disparity populations to ensure that discoveries and interventions created are responsive to the community's needs. This research methodology recognizes the strengths of each partner, with researchers and community members engaged together across the lifecycle of projects (e.g., needs assessment, planning, research design, implementation, evaluation, and dissemination of interventions).

Participatory Technology Assessment (pTA) is a type of community engagement designed to include citizen voices in science policy discussions. For example, the National Oceanic and Atmospheric Administration (NOAA),

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National Aeronautics and Space Administration (NASA), and the Department of Energy (DOE) have hosted public dialogue and deliberation forums in collaboration with the ECAST Network (Expert and Citizen Assessment of Science and Technology). NOAA's Citizen Science, Civics, and Resilient Communities project has sought community input on resilience strategies to address the climate crisis.[24]

In recognition of the fact that resourcing is one key to long-term stakeholder engagement, the Department of Labor (DOL) has worked to directly increase community capacity by providing resources (grants, financial assistance, and procurement opportunities) directly into underserved communities. Community-based groups engaged through contracts participate in benefit navigation and uptake, or even enforcement processes (e.g., setting up systems to receive complaints and claims in a more participatory and responsive way).

In response to public health concerns resulting from the pandemic, the Centers for Disease Control and Prevention enacted an eviction moratorium. To access eviction protections under this moratorium, the CDC requires renters to complete a 'declaration" form swearing that they meet the criteria for not being evicted. A legalistic, dense form could deter eligible tenants out of receiving these protections, or add unnecessary stress for already stressed tenants at risk of eviction. These consequences would disproportionately fall on Black and Hispanic households, who are more than twice as likely to be renters than white households. Usability testing was critical to ensuring that the entire team could interact with those with lived experience. The team observed people from across the country and all stages of life, noting where there were questions, confusion, and where users said it wouldn't be effective. They made changes between each session, and tested over 20 versions over the course of two weeks with 16 different people, including tenants, legal aid lawyers, and tenant advocates.

Agencies must conduct stakeholder engagement as they develop their Agency Strategic Plans, including the Learning Agenda required by the Foundations of Evidence-Based Policymaking Act of 2018 ('Evidence Act").[25] Stakeholder

24. See, for example, Weller, N., Sullivan Govani, M., & Farooque, M. (2020). *Supporting Federal Decision Making through Participatory Technology Assessment.* Day One Project. Retrieved July 5, 2021 from https://www.dayoneproject.org/post/supporting-Federal-decision-making-through-participatory-technology-assessment

25. Pub. L. 115–435

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engagement provides critical input as to the what an agency's strategic and learning priorities should be, as well as offers insights into strategies to meet priorities and opportunities to build evidence where it is lacking. Agencies are currently in the process of developing their plans for FY 2022 to FY 2026, and are actively engaging stakeholders in this process. Stakeholders include the public, Congress, and other groups, and for the Learning Agenda, States and localities and non-governmental researchers as required by statute. OMB recently reaffirmed the importance of stakeholder engagement in developing Learning Agendas in OMB M-21-27.

Finding

4

Advancing equity requires long-term change management and a dedicated strategy for sustainability.

Experts note that changing systems and organizations is notoriously challenging—so much so that the work of sponsoring large-scale change is often referred to as a "wicked problem."[26] The "wickedness" of the challenge lies in the fact that problems often persist because of complex interdependencies, where solving one aspect of the problem reveals or creates new challenges.

Systems change becomes feasible when a sense of urgency prevails and the status quo becomes untenable.[27] Section 1 of the Order identifies the urgency to which this initiative is directed: "a historic movement for justice has highlighted the unbearable costs of systemic racism." According to organizational-behavior experts, once urgency is established, the key elements of change include: a clear change vision; a coalition of committed actors; opportunities for broad-based action; and short-term accomplishments. However, for change to take root, organizational cultures must also shift, and the people in those cultures must

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26. Churchman, C. (1967). Wicked problems. *Management Science,* 14(4), B141-B142. Retrieved July 7, 2021 from https://www.jstor.org/stable/2628678?refreqid=excelsior%3Abdef2ca91d83dfad56d41cc1766df1a0&seq=1#metadata_info_tab_contents.

27. John Kotter has authored a number of influential studies on organizational and systems change that delineate a common architecture of change across different contexts. For an overview of this work, see Kotter, J. (2021). *Change: How organizations achieve hard to imagine results in uncertain and volatile times.* Wiley.

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consolidate new skills.[28] Thus, an equity assessment unaccompanied with a dedicated strategy for longer-term change will be ineffective at truly changing the status quo.

Equity specialists note that the work of advancing equity typically involves complex, long-term change management.[29] The reason for this sustained attention is that many forms of systemic bias flourish in practices that appear to be neutral on the surface. Upon examination, equity and justice applied to specific practices can, and often do, mean different things to different people, based on their lived experience. The implications are significant. Agency stakeholders may differ in their view of equity challenges across different agencies, just as stakeholders within Government may not always agree on how to advance equity optimally.

Thus, even when agencies subscribe to a common value—for example, of allocating resources fairly—different agency teams (or even different people on the same team) may have different ideas about how to make policies and procedures more equitable. Although data-driven approaches help by providing a more objective platform for decision-making, even the most robust analytics still leave teams with choices to make and trade-offs to weigh.

This is the case, of course, with any type of policy decision. Equity-related concerns, however, are distinct from many other types of policy, because they can also implicate identity-based group membership. For example, when data analysis illuminates the possibility of more than one policy choice, the choice that is presumed to be "right" will be different for different people. Although organizational research has shown that diverse teams consistently yield innovative solutions, they do so only to the extent that they have internalized the skills to adaptively navigate tensions that otherwise might impede constructive

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28.   Organizational change experts like Ronald Heifetz suggest that culture change of this type represents an "adaptive challenge" where the members of a community or work unit recognize that a gap exists between their values and their practices. Bridging the adaptive challenge requires group members to engage in learning to determine which elements of their organizational "DNA" are necessary and which can be set aside in order for progress on collective problems to be addressed. For a perspective on culture change that requires emotional and cognitive skill building, see Heifetz, R. & Linksy M. (2017). *Leadership on the Line: Staying Alive Through the Dangers of Change.* Boston: Harvard University Press.

29.   Perspectives that integrate change management into Diversity, Equity and Inclusion initiatives are emerging in organizational learning. See, for example, https://seadecc. com/leadership-strategies/f/diversity-inclusion-scheins-change-model

FINDING #4

problem-solving.[30] Thus, the work of advancing equity often tests organizational cultures. However, these challenges—if anticipated and managed well—can enable agencies to expand their capacity to engage diverse voices, enhance collective problem-solving, and model good governance. Building this capacity, for example, requires agency leaders and teams to anticipate and welcome divergent perspectives as a matter-of-course; treat differences of opinion (and even value differences) as opportunities to surface important interests; and develop problem-solving skills that include perspective-taking, negotiation, and conflict management.[31]

The Order has galvanized agencies to prioritize equity in order to meet the deadlines the Order establishes. However, sustaining this work beyond the terms of the Order requires embedding equity into the normative processes, routines, and incentives of the Federal Government to include strategic planning, agency priority goals, and agency learning agendas. This study notes that agencies are addressing longer-term change through strategic, budgetary, and learning planning efforts, dedicated senior leadership, and investment in key workforce functions, skills, and support.

Organizational Performance. The most consistent approach across agencies to support organizational readiness for the equity assessment process charged by the Order was for agencies to empower a leadership-level equity team with oversight of subgroups. For some agencies, evaluating their operations on the basis of service delivery and identifying measures of equity represented a new perspective and required skill-building. Meeting milestones in the Order on time in some instances required agencies to make trade-offs between programs undertaken for initial equity assessments. Agencies reported that these "difficult conversations," among other challenges during the equity assessment process, required of agency teams flexible thinking; in some instances, a willingness to reckon with history; and new ways of working and learning together.

Leadership Transitions. Currently, some agencies are rebuilding leadership ranks and strategic direction following the transition between administrations. Although the Order provides a clear vision and mandate, some agency equity teams have

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30.   Gratton, L., et al. (2007). Bridging fault lines in diverse teams. *MIT Sloan Management Review,* 48(4), 22. Retrieved June 29, 2021 from https://sloanreview.mit.edu/article/bridging-faultlines-in-diverse-teams/?gclid=CjwKCAjw47eFBhA9EiwAy8kzNO7NAnuB-0vhV-UIUlLtQC92iktxbbX6xajHJfL5QWGZ32XGjwPgFwRoCsSsQAvD_BwE

31.   OMB's learning community has included learning modules for managers on "leadership for equity" that focus, among other things, on managing competing commitments and strategies to help people better understand the perspectives of others.

FINDING #4

been careful not to move ahead of the process of new agency leadership setting overarching agency priorities, including through agency strategic plans. OMB has noted that in agencies where senior political and SES leaders are seen as champions for equity, the assessment process itself created a platform for shared learning and collective strategizing to formulate agency-specific trajectories to realize equitable outcomes.

Support for, and Investment in, Key Workforce Functions. In many agencies, equity expertise and supporting skills and capacities—such as human-centered service designing public feedback mechanisms, engagement and participation design, evaluation and evidence planning and analysis, and data science—are limited or do not sufficiently exist in Federal agency workforces. Challenges exist in finding and contracting with vendors to augment subject matter expertise, training, and operational leadership. Organizations that have transformed effectively achieved long-term change by building in-house culture, capacity, skills, and expertise. To fully implement the work initiated by the Order, agencies will need additional expertise and dedicated capacity, including Government-wide efforts to support streamlined agency hiring of subject matter experts; carving out funding to support full-time staff and teams in key areas of identified capacity shortages or skills gaps; and charging human capital officials with identifying hiring strategies that can be used to support agency- or department-wide efforts that do not fit neatly within existing organizational designs. OMB acknowledges that OMB itself requires additional staff in priority areas to support workstreams in evidence and evaluation, service design, and equity, among other areas.

Finding
5

The scale of initiatives by the Federal Government creates an opportunity to advance equity by ensuring that resources are made available equitably though its core Federal management functions including financial management and procurement.

Opportunities for Improving Equity in Financial Management

In fiscal year 2020, the Federal Government spent $6.55 trillion dollars.[32] More than $700 billion of these funds are expended annually through financial

32.   Data Lab. (n.d.) *Federal spending by category and agency.* USA Spending. Retrieved July 15, 2021 from https://datalab.usaspending.gov/americas-finance-guide/spending/categories/.

FINDING #5

assistance (commonly known as grants and loans). Federal funding supports activities that touch every American, including medical research, infrastructure, student aid, public housing, and disaster assistance. These funds are provided to individuals, companies, universities, non-profit organizations, State, Tribal, territorial, and local governments, and small businesses. How agencies plan, organize, direct, report, and control their financial activities as budgeted can have an outsized impact on their performance, and ability to achieve equitable results. Federal financial management policies can play a significant role in ensuring that Federal resources are allocated equitably. Financial management activities—including financial, reporting, payment-integrity processes and systems, financial data transparency, and risk management—can be powerful enabling functions for agencies driving toward equitable outcomes across programs.[33]

Core financial management practices provide a number of opportunities to embed equity:

- Agencies can leverage existing authorities to increase transparency regarding equity in Federal spending.

- Agencies can continue to publish information about Federal financial assistance awards, including linkages to budget- and account-level data, also in support of the Transparency Act of 2006.

- Increasing access to high-quality data about recipients and beneficiaries of Federal funds across programs Government-wide could provide greater insight into the equity implications of Federal spending.

- In existing measures for financial management, agencies also report on amounts and trends in the underpayment of Federal benefits.[34] While underpayments represent approximately 0.3% of reported Federal outlays,[35] underpayments may be underreported if agencies require a complaint or

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33.   For example, Government agencies have continued to work on financial inclusion for Federal programs, including serving domestic and international unbanked communities. E.g., https://www.treasury.gov/press-center/press-releases/pages/jl0675.aspx (describing efforts); https://www.usaid.gov/digital-development/digital-finance (describing efforts in USAID).

34.   The Payment Integrity Information Act of 2019, consistent with prior legislation, requires reporting of payment accuracy (underpayments, overpayments, unknown payments, etc.).

35.   Around 2.9% of all Federal outlays lack documentation to substantiate their propriety, thus, the total number of underpayments may be higher than the 0.3%. https://www.paymentaccuracy.gov/.

FINDING #5

protest. Underpayments may indicate unequal participation in Federal funding.[36] Further research can examine the distribution of these underpayments and whether the data reflect any underlying systemic inequity.

At present, agencies' evaluations of financial performance and risks do not routinely track the extent to which financial activities as budgeted advance equitable outcomes. OMB notes that by assessing financial performance in the context of equitable outcomes, agencies can use many existing financial-management processes in the service of advancing equity.

Enhancing Program Design and Integrity Efforts to Address Equitable Results

Grants managers in organizations that have received Federal funding often report spending more time on burdensome compliance activities than on supporting program results.[37] Ongoing government-wide initiatives led by OMB encourages agencies to focus on performance over compliance. Most recently, OMB Memorandums M-21-27 and M-21-20, directs agencies to consider existing flexibilities to apply a risk-based, data-driven framework to alleviate select compliance requirements and hold recipients accountable for results. The Federal Government continues to work on balancing financial management with achieving programmatic objectives. The current focus on results supports im-proved methods to assess whether agency policies create or exacerbate barriers to full and equal participation in Federal funding.

For grants, Title 2 of the Code of Federal Regulations (2 CFR) and OMB's Grants Performance Management Playbook provide a framework for improving agencies' program performance.[38] Federal agencies are required to consider the flexibilities within these policies when designing programs to best reach their target beneficiary communities. Per 2 CFR 200, "The program must be designed with clear goals and objectives that facilitate the delivery of meaningful results

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36. The SSA's Office of Inspector General recently raised an issue of underpayments affecting certain groups of participants, see https://www.oversight.gov/sites/default/files/oig-reports/A-09-19-50848.pdf.

37. *2017 Annual Grants Management Survey.* (2017). The George Washington University, the National Grants Management Association and REI Systems. https://www.reisystems.com/rei-in-govexec-how-agencies-can-improve-grant-management/

38. Office of Management and Budget. (2020). Managing for results: The performance management playbook for federal awarding agencies. https://www.cfo.gov/wp-content/uploads/2021/Managing-for-Results-Performance-Management-Playbook-for-Federal-Awarding-Agencies.pdf

FINDING #5

consistent with the Federal authorizing legislation of the program."[39] OMB also leads efforts to develop tools, guides, and pilots that explore specifically the integration of equity and access into financial management decisions, especially for payment integrity.

Improving Equity in Procurement

The Federal Government, with annual contracting spending of $650 billion,[40] is the world's largest and most influential buyer. However, businesses must often spend countless hours and tens of thousands of dollars, or more, learning how to navigate the Federal Government's contracting process and effectively compete against larger and more experienced firms. This can be a barrier to entry for small disadvantaged businesses with fewer resources. These challenges have been exacerbated by the lack of meaningful data analytics focused on the depth and diversity of the Federal small business supplier base, which has allowed a decline in the base over the last decade, including a decrease in new entrants, to go largely unaddressed. As the Order recognizes, advancing more equitable procurement management practices and strategies is one way to ensure that Federal resources reach underserved communities while also meeting the critical needs of the American public.

Breaking into the Federal marketplace and maintaining a footing is difficult and costly for a variety of reasons:

- *Inadequate vendor outreach practices.* The Government continues to rely heavily on a relatively small number of communication channels (e.g., industry association events), that, while generally helpful, miss chances to make more meaningful connections through broader and more dynamic engagements (e.g., with local chambers of commerce, supplier scouting, business development, and technical assistance programs).

- *Lack of visibility into available opportunities.* Understanding Federal missions and which ones require services that may be a good business fit can be daunting, especially for a new entrant that may lack the resources to identify opportunities that may be a good match. While there are many Government-wide repositories of information, none provide full transparency into the full array of procurement opportunities and buying trends. SAM.gov

39. 2 C.F.R. § 200.202.
40. See Federal Procurement Data System, accessible through https://beta.sam.gov

FINDING #5

is the core site for all government contracting activity, but public visibility into transactions for a number of popular buying programs focused around commercial services and research and development to help businesses understand agency buying trends is limited to specific agency programs. The difficulties new and recent entrants face in navigating the Federal marketplace can create unfair advantages for incumbent contractors, complicating efforts to diversify the Federal supplier base.

- *Insufficient agency management attention.* Too often, agencies fail to take full or strategic advantage of programs that are intended to address inequity, such as section 503 of the Rehabilitation Act and the AbilityOne Program that are designed to increase and expand the type of job opportunities that can be successfully met by people with disabilities. These authorities, when used effectively, can have a significant impact in helping one of the most vulnerable populations in our society make meaningful and ongoing contributions to the critical missions of our Federal Government.

Several leading examples demonstrate opportunities that Federal agencies might use as building blocks as they work to reduce barriers and increase access to agencies:

- Dynamic agency forecasts of contracting opportunities, such as at USAID, that provide real-time information that entities, including socially and economically disadvantage small businesses, can use in preparing to participate in competitions for work.

- Innovative vendor engagements that minimize the need for vendors to make costly investments or learn special skills just to sell to the Federal Government.

- Equity-focused management practices, such as use of performance plans that hold senior agency officials accountable for increasing diversity in the supplier base by tying payment incentives to achievement of socioeconomic small business contracting goals.

- Programs, tools, and advocates, such as the Office of Disability Employment Policy's Workforce Recruitment Program (WRP) and Employer Assistance and Resource Network on Disability Inclusion (EARN) tools and a growing number of AbilityOne Representatives at agencies, who promote meaningful work by entities that contract with the Federal Government at competitive wages for people with disabilities.

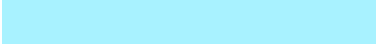# Designing Initial Structures and Approaches to Assess Equity within the Federal Organizational Context

Engaging in equity assessments across all Federal agencies concurrently, for a broad array of Federal activities, is an unprecedented undertaking. Since the Order, OMB has assisted agencies in designing and implementing their assessment approaches. The initial approach to agency equity assessments fostered by OMB included the following elements:

Assessing High Impact Services. Agencies were invited to identify 3-5 high-impact services to assess. For the purpose of this study, high-impact services were described as those representing the agency's highest dollar spends (e.g., Supplemental Nutritional Assistance Program (SNAP)); those with high volumes of transactions or customers served annually (e.g., Individual Tax Filing); services that have significant impact on the lives of people even if smaller dollar value or volume (e.g., Tribal grant programs); or those that are specifically designed for historically underserved communities (e.g., 8a Business Development Program).

Establishing Cross-Functional Agency Equity Teams. Agencies were requested to design tiered, cross-functional teams consisting of staff who engage directly with the public, career staff, agency leadership, and those with expertise in evaluation, data and information, program integrity, human resources, and other operational functions.

Developing Agency-Specific Assessment Processes. Agencies were tasked with developing an assessment process, specific to the agency's mandate and scope, focused on the impact services chosen for assessment, and include stakeholder engagement activities. Agencies received additional support from OMB for their processes of assessing agency services, including on:

- Service context (e.g., historical reason for the creation of the service, changing populations served, characteristics of those interacting with the program/service);

- Service performance (e.g., measures used to hold this service to account, evaluation and learning activities that identify gaps); service design (e.g., measures that evaluate burden of participants to access or maintain the service); and

- Service system (assessment of how agency service interacts with other systems and/or delivery partners).

OMB also supported agencies in identifying inequitable administrative barriers (e.g., excessive documentation or complicated eligibility formulas); recommendations for how agency equity teams might facilitate initial intra-agency conversations, design workstream trajectories, and refine insights.

All agencies have access to and were encouraged to participate in the Equity Learning Community and to participate through a variety of formats (e.g., office hours consultations). As agencies are required to submit their Equity Assessments on August 8, 2021, OMB and DPC will reflect upon the approaches and methods piloted above and identify learnings to guide future efforts.

Examining Equity Assessment Actions and Pilots Undertaken by Agencies to Date

As noted, the Federal Government has never before undertaken a comprehensive Government-wide equity agenda. The equity assessments required to be completed by agencies within 200 days of the Order are driving equity-focused actions across Federal agencies. As this study is required to be released before Agency Equity Plans are due for submission, it can only describe a sample of early actions and prospective plans in support of the Order from a subset of agencies. The actions listed below represent current illustrations of agency approaches to equity assessment. As noted throughout this study, equity assessment approaches and actions to advance equity are not "one size fits all" but rather should be tailored to the context of particular agencies, programs, communities, and activities.

DEEP DIVE

Agency Examples

Agency Initiatives to Apply Equity Assessment and Data Approaches

Department of Transportation (DOT), Department of Agriculture (USDA), and National Aeronautics and Space Administration (NASA)

Requests for Information

These three agencies are asking for ideas from the public on how they may use their data in more effective and new ways to support equity efforts, as well as tapping the public's knowledge as a source of innovation, expertise, and troubleshooting. NASA seeks public input on opportunities to leverage its data, expertise, and missions to help underserved communities as well as barriers facing underserved communities to accessing current NASA grants, programs, and procurements. The Department of Agriculture's RFI invites stakeholders to describe the barriers underserved communities face in accessing USDA programs and information including applying for loan and grant programs. DOT hopes to receive input from the public on the data and assessment tools available to assess transportation equity—for example, how the department should identify and measure the benefits and drawbacks (e.g., safety, wellbeing, and mobility benefits) of Federal transportation investments to underserved communities.

DEEP DIVE: PILOTS

Department of Labor (DOL)

Summer Data Challenge on Equity and Underserved Communities

In March 2021, the DOL Chief Evaluation Office held the Department of Labor's first Summer Data Equity Challenge competition for scholars to analyze how Federal labor policies, protections and programs reach traditionally underserved communities. Selected researchers will analyze existing data to help the department understand barriers to accessing benefits and services. The analyses will cover a variety of topics, including studying access to unemployment insurance, Family and Medical Leave Act (FMLA) eligibility and coverage, geographic and industrial patterns in rates of disability among workers and social supports for those workers, and how new statistical methods can better target worker protection efforts. Populations of interest include those from communities traditionally un-derserved due to race, gender identity, sexual orientation, ethnicity, income, geography, immigrant status, veteran status and disability status, among others. Analyses must use data to illuminate meaningful gaps in knowledge and, ideally, propose practical solutions to fill those gaps. The competition funded awards of $10,000 - $30,000 each to both established and emerging researchers to complete analyses between June and October 2021.

Health and Human Services (HHS)

Office of the Assistant Secretary of Planning and Evaluation (ASPE) Environment Scan of Equity Impact Assessments Across Government and Philanthropy

Equity Impact Assessments (EIAs) provide systematic examination of how various groups will be affected by a proposed action or decision. They can help prevent or remedy previous inequitable or discriminatory policies and program design decisions when conducted during the deliberative process before proposals are fully formulated and enacted. The Office of the Assistant Secretary for Planning and Evaluation (ASPE) in the Department of Health and Human Services has completed an environmental scan of EIAs across government and philanthropy and, with the support of a contractor, is piloting a set of tools for such assessments in the OMB Circular A-19 legislative policy proposal development process. Given the various types of programs, policies, and processes HHS has, as well as its various policy-making vehicles, HHS will use the scan to inform recommending equity assessments that are tailored to the purpose and can be used in both brief and ongoing processes.

DEEP DIVE: PILOTS

Department of Transportation (DOT)

Tools to Enable Cross-Agency Equity Goals

DOT has a number of tools that other agencies and stakeholders could use to address life events that bridge different agencies. These include the Community Impact Assessment Quick Reference for Transportation, designed to provide information on how to conduct a community impact assessment in order to evaluate the effects of a transportation action on a community and its quality of life; and the National Transportation Atlas Database, a set of over 80 nationwide geographic databases of transportation facilities, transportation networks, and associated infrastructure that includes the National Transportation Noise Map and National Transit Map.

Agency Initiatives for Reducing Administrative Burden

Department of Homeland Security (DHS)

United States Citizenship and Immigration Services (USCIS) and Federal Emergency Management Agency (FEMA)
Honest feedback on how to reduce barriers

Two DHS components have issued RFIs asking stakeholders to identify, with specificity, administrative burdens, program requirements, information collection burdens, waiting time, or unnecessary complexity that may impose unjustified barriers in general, or that may have adverse effects on equity for all, including individuals who belong to underserved communities that have been denied equitable treatment. Currently, both the disaster survivorship and immigration processes are extensive, involving detailed forms and, in the case of immigration, substantial fees, examinations of supporting evidence, and interviews.

Agency Initiatives for Stakeholder Engagement

Housing and Urban Development (HUD)

Focus on Lived Experience and Direct Engagement

Many of HUD's programs involve HUD working with intermediaries (e.g., jurisdictions, Public Housing Authorities, housing counseling agencies, etc.) rather than the individuals and households the programs are designed to

DEEP DIVE: PILOTS

serve. Accordingly, engagement often focuses on those intermediaries. Many engagement activities are driven by regulatory requirements. Government systems to obtain input on formal rulemakings are not designed to reach individuals. Draft guidance documents may be shared with the public in advance for input, but the distribution networks tend to be focused on the parties who are subject to the guidance, not the people who will be affected once that guidance is implemented and the content of the material may not be easily understandable by the general public. HUD intends to extend its engagement activities to hear from members of underserved communities to better understand their experiences and allow those experiences to shape programs. HUD's Action Team will focus on changes throughout the Department to improve stakeholder engagement, recognizing HUD's wide range of programs, stakeholders, and activities. This will involve considering: current methods used to obtain input; whose voices are missing; what methods HUD could adopt to learn from those missing voices; and different options for different programs with different purposes.

Practices to Address Equity in Procurement and Financial Management

Small Business Administration (SBA)

Equity in Small Business Development

The 8(a) Business Development (BD) program is unique among SBA's programs in that by statute its purpose is to provide business development assistance, including contract support, to businesses owned and controlled by socially and economically disadvantaged business owners and entities. Eligible participants are small businesses owned by socially and econom- ically disadvantaged people or entities who have been subjected to racial or ethnic prejudice or cultural bias within American society. In addition, Native entities (i.e., Tribes, Alaska Native Corporations, and Native Hawaiian Organizations) may participate through for-profit subsidiaries to benefit their applicable underserved Native communities. Through an equity impact assessment, SBA will explore which of the goals and benefits of the program resonate differently across the groups eligible to participate.

Recommendations
Expanding Use
of Findings

Recommended Approaches to Expand Use of Findings

The process to complete agency equity assessments within 200 days of the Order has catalyzed equity-focused innovation across Executive agencies. Further comprehensive change will be enabled by encouraging specific equity initiatives in Federal planning efforts, including agency strategic plans, priority goals, learning agendas, fiscal year (FY) 2023 budget formulation, and the introduction of a Government-wide learning agenda, which will include a focus on equity.

Through the course of conducting this study, OMB has identified six recommendations to expand the use of equity assessments Government-wide:

	Recommended Approaches Description
Recommendation **1.1**	**Continue to identify methods, consistent with applicable law, to assess equity and improve programs.** With equity assessment, especially of Federal programs and policies, still a nascent and evolving science, this study supports the continued exploration of practices to assess equity, and recognizes that the measurement of equity (access to services and impact) remains an evolving body of work in public policy, data science, and organizational change management. Some of the most promising practices are those that take into consideration: the historical legacies of disparities; address prospective assessments of new interventions and include methods that address equity in program/service eligibility and those which assess whether eligible persons, and communities, receive affirmative benefit, and why.
Response to **Finding 1**	A broad range of assessment frameworks and data and measurement tools have been developed to assess equity, but equity assessment remains a nascent and evolving science and practice.

RECOMMENDED APPROACHES TO EXPAND USE OF FINDINGS

	Recommended Approaches Description
Recommendation # 1.2	**Prioritize investment in the expertise, capacity, and capabilities needed to measure and advance equity through improved data collection and analysis.** High-quality equity assessments, as described above, require data-collection and data-analysis procedures with the capacity to disaggregate the characteristics of different groups. Given the common barriers to equitable data identified, this study supports the priority attention by agencies and through the Equitable Data Working Group on new efforts and methods to improve Federal data-collection and data-analysis methods, including for disaggregated data, that will enable Government to conduct more effective equity assessments and better understand the impacts of Federal programs and service delivery for all Americans.
Response to **Finding 1**	A broad range of assessment frameworks and data and measurement tools have been developed to assess equity, but equity assessment remains a nascent and evolving science and practice.
Recommendation # 2.0	**Continually assess and work to mitigate administrative burdens.** Given the impact of administrative burden on exacerbating inequity, this study suggests that conducting burden audits, planning regulatory agenda items and learning activities focused on assessing and mitigating administrative burden, may be an especially promising approach towards advancing equity, in particular as it relates to effects on program integrity.
Response to **Finding 2**	Administrative burden exacerbates inequity.

RECOMMENDED APPROACHES TO EXPAND USE OF FINDINGS

	Recommended Approaches Description
Recommendation # 3.0	**Prioritize investment in the expertise, capacity, and capabilities needed to meaningfully engage stakeholders.** In order to include the broadest representation of community voices, agencies need to expand stakeholder engagement initiatives. Agencies, in collaboration with OMB, can collectively expand engaging stakeholder communities around the experiences of concerns to communities, rather than the perspective of the agency. This approach enables individuals to share feedback on their engagement with Government (including Government programs and services), without forcing individuals to tease out distinctions between which Government entity is responsible for what step. As agencies innovate and expand stakeholder engagement, this work should be tracked and evaluated in terms of its capacity to identify, engage, and elevate new voices relevant to agency policy initiatives and to enable efficiencies.
Response to **Finding 3**	The Federal Government needs to expand opportunities for meaningful stakeholder engagement and adopt more accessible mechanisms for co-designing programs and services with underserved communities and customers.
Recommendation # 4.0	**Sustain and institutionalize equity in administrative, budget, learning, planning, and workforce initiatives.** This study recommends that agencies recognize that the work of advancing equity requires attention to long-term change, including institutional and culture change elements within agencies. An expanded architecture for learning and training, to build the human capital of Government, is needed to advance sustained implementation of equity initiatives. OMB is positioned to leverage and build the Equity

RECOMMENDED APPROACHES TO EXPAND USE OF FINDINGS

Recommendation 4.0 continued

Learning Community to support agencies' initiatives to close gaps identified by the equity assessment process. Training initiatives focused on stakeholder engagement and those that address agencies' concerns about the legal parameters of equity initiatives would address current obstacles identified by agencies. Agencies may also benefit from training that is customized for leadership and management on how to implement organizational cultural change around equity.

Further, in order for agencies to build on the foundation established by the Order to advance equity, it will be important that agencies embed equity assessments and an equity lens into their regular routines such as the setting of Agency Priority Goals, identifying equity-relevant knowledge gaps in their learning agendas, and determining where and if progress on equity might be included in agency leadership executive performance plans.

The interagency management councils, such as the President's Management Council, the Chief Financial Officers Council, the Chief Information Officers Council, the Chief Acquisition Officers Council, the Interagency Council on Statistical Policy, Evaluation Officer Council, and Chief Data Officer Council, among others, all of which enable agencies to collaborate and coordinate, can accelerate efforts, already begun, to incorporate equity into their work.

Response to
Finding 4

Advancing equity requires long-term change management and a dedicated strategy for sustainability.

RECOMMENDED APPROACHES TO EXPAND USE OF FINDINGS

	Recommended Approaches Description
Recommendation **5.0**	**Review core financial management and procurement guidance documents and practices for opportunities to embed equity.** This could include: • Leveraging existing financial-management authorities to increase transparency of equity in Federal spending. • Incorporating equity into agencies' evaluation of financial performance and risks. • Conducting advanced market research and supplier scouting to identify and engage the business base where they are, including and attracting nontraditional companies who generally do not do business with the Government. • Partnering with technical and business development organizations to create more targeted outreach to underserved communities. • Establishing new measures of business diversity related to Federal procurement, using procurement data to evaluate progress in expanding opportunities for underserved communities, such as awards to different minority-owned firms and small business firms in rural areas. This data also could be used to inform SBA's small business procurement scorecard and other acquisition-management tools.
Response to **Finding 5**	The scale of initiatives by the Federal Government creates an opportunity to advance equity by ensuring that resources are made available equitably though its core Federal management functions including financial management and procurement.

Concluding Reflection

The findings from this study support the need for continuing and deepening a systemic approach to equity to include ongoing development of equity-focused assessment and measurement tools. Such an approach also requires dedicated support and resources as well as approaches to change management that position agencies to build in regular processes for equity assessments and chart pathways to address the gaps and barriers they identify to advance equity.

Upon submission of equity assessments from agencies in August 2021 to the Assistant to the President for Domestic Policy, OMB will work with DPC to review individual agency activities and analyze agency progress. In the pursuit of delivering on the vision of this ambitious Order, this work will facilitate agencies' development of their Equity Action Plans, due to the DPC in January 2022.

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Study to Identify Methods to Assess Equity: Report to the President

July 2021