



# Pathways to Equity at Scale

## A Synthesis of the 2022 Federal Equity Action Plans and Recommendations for 2023 Plans

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On February 16, 2023, the Biden administration released an executive order, *Further Advancing Racial Equity and Support for Underserved Communities through the Federal Government*,<sup>1</sup> that offers more guidance on the administration's goals of embedding equity in government-wide processes, including the creation of annual equity action plans. This order includes attention to organizational structures that support large-scale change management. Over the past months the Urban Institute has analyzed 24 federal-agency equity action plans generated in response to the administration's Executive Order on Advancing Racial Equity and Support for Underserved Communities through the Federal Government, released January 20, 2021. This brief reviews the commitments made in those plans and offers a potential framework for the next stage of federal equity action. It categorizes equity commitments into different types of equity concepts and actions, shares agency-specific examples, and proposes recommendations for agencies' equity planning.

Across the largest agencies we reviewed, plans generally focused on early wins and foundational tasks or tactics. Ideally, the next phase of equity-focused activities would address system-level strategies such as the following:

- pursuing more distributional equity (e.g., reallocating resources) and/or structural equity (through policy change)

- focusing more on outcomes (e.g., closing employment gaps by a certain percentage) than changes in process (i.e., procedural equity)
- reducing barriers to access and participation facing certain target populations by identifying specific strategies or program remedies to reach nonparticipants
- improving data collection and initiating new analysis of existing data to better understand the extent of challenges in reaching underserved populations

With these next steps, federal agencies could move from the equity action plans toward equity accountability plans—plans that would hold specific units or people within agencies responsible for improving outcomes related to the systems-level strategies they plan to enact.

## Introduction

The Biden-Harris administration’s historic day-one executive orders issued in January 2021 include executive order 13985, which called on federal agencies to “assess whether, and to what extent, [their] programs and policies perpetuate systemic barriers to opportunities and benefits for people of color and other underserved groups” and create equity action plans.<sup>2</sup> The federal government had “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.”<sup>3</sup> Within 200 days, agencies had to report on barriers that underserved groups may face to accessing federal benefits programs; barriers to accessing government procurement and contracting opportunities; whether new agency policies, regulations, or guidance on equity were necessary; and how their operations and resources advance civil rights for disadvantaged or underrepresented communities.

The action plans were poised to deliver on the executive order’s promises to make the abstract concept of equity in government more concrete. The executive order aligned agencies using a common definition of equity:

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.<sup>4</sup>

The definition itself marks an important milestone for moving federal agencies’ attention beyond equality (equal treatment) to equity (fair treatment that ideally results in equal outcomes). The call for equity action plans also raised expectations among constituents and advocates that agencies might issue reexaminations of their policy histories and their roles in today’s inequities, as well as concrete sets of tactics or sets of program reforms in response to those histories. These high expectations stemmed in part from the intense and traumatic events that occurred in the United States throughout

2020, including hundreds of thousands of deaths from COVID-19 that disproportionately affected communities of color, as well as the murder of George Floyd by Minneapolis police officer Derek Chauvin in May of that year and other incidents of police violence. Those events highlighted the many severe racial and social inequities sustained by public and private systems that benefit or reward privileged groups who have held wealth and power for centuries.

Federal agencies followed through with the instructions in the executive order, which included the public release of equity action plans in spring 2022. Key to these plans were new commitments around public performance measurement and tracking, which are the bread and butter of government and inform how constituents understand how well government works for them. Examples of how people define good performance include short wait times for tax refunds or how much financial support the state offers in health care, child care, and education. In the same way, an agency publicly committing to fairly distributing refunds and spending, and to tracking that commitment, enables people to track how well government works for all.

Not all agencies began this process with the same understanding or capacity related to addressing unfair practices. In addition, the process that agencies were required to follow did not include a readiness assessment to group agencies according to their starting points regarding equity actions, nor did it prescribe how agencies with different missions and scopes could build on their capacities, such as data collection, staffing, or measurement.

The ambitious scope and timeline for the equity plans could have both catalyzed and inhibited action and innovation. The charge to develop the plans came from an executive order and not through legislation, meaning agencies have flexibility but not necessarily congressional funding or new financial resources to carry out parts of their plans. In addition, the plans were drafted at a different time than agencies' evaluation plans and their learning agendas, strategic plans, and agency priority goals, meaning some agencies may have built equity actions on top of foundations of strategic planning whereas others may have built them peripheral to their overall strategies. In addition, because the executive order did not require a comprehensive review of all agency programs and policies, and because it trained attention on civil rights and procurement policies (see sections 6 and 7 of the executive order), these plans represent important, albeit incomplete, records of strategies agencies may be using to address racial and other inequities. Some agencies ended up informally integrating equity commitments into subsequent planning and monitoring, whereas others had already drafted in-depth equity plans before the executive order.

In the rest of this brief, we describe the Urban Institute team's process for reviewing the equity action plans, describe how we categorized agencies' equity commitments into different types of equity concepts and actions, provide agency-specific examples, and provide recommendations for agencies' equity planning. This review comes many months after the plans were drafted, and many agencies may have enhanced or integrated equity strategies via other mechanisms. We hope this review informs the ongoing implementation of and strategy around the new requirement for annual equity action plans.

## Urban's Review Process

The Urban Institute's Office of Race and Equity Research reviewed the equity action plans of 24 federal agencies for common themes, challenges, and commitments. We focused on agencies doing work related to social, educational, and environmental policymaking. Rather than rate agencies on their follow-through or thoroughness, we distill the types of commitments agencies made into categories that could help each agency build its equity strategy.

We developed a rubric of equity principles that draws from a combination of equity maturity and equity evaluation models and from our own research.<sup>5</sup> First, before evaluating agencies' new actions, it is important to take a historical view and see what systems and structures have been built and whom those structures have benefited or harmed. The 2021 executive order specifically recognizes historically underserved communities. Thus, we reviewed agencies' definitions of equity and related acknowledgements of past harm, recognizing that agencies' different organizational cultures and services allow for or prompt different degrees of historical acknowledgement. Second is the principle of forward-looking remedies. This includes agencies' commitments to changing the delivery of services or allocating resources in ways that give underserved communities what they need to catch up on missed opportunities. These commitments can include remedies at the practice, program, and policy levels.

Reviewers used the rubric to examine the equity plans for a common set of concepts and levers for change. This framework guided the reviewers' qualitative impressions of each agency's equity goals and strategies. The plans focused on multiple dimensions of equity—not only race, but also gender and sexual identity, disability, and others. Therefore, we explored how agencies defined equity (beyond the definition in the executive order) for their relevant dimensions and populations, how they proposed to measure equity, and how that informed the extent of their commitments. Though not all equity principles can be quantified, federal agencies often use performance measures to assess the results of programs and policies. Therefore we sought to document measures related to equity where they exist (we have listed these measures in forthcoming digests in which we summarize the agencies' equity action plans).

We grouped agencies' goals and commitments into three operational approaches to equity: procedural equity, distributional equity, and structural equity. These three categories can also be seen as three stages of equity, although because they are interrelated, they may not occur in every agency in the order in which we present them. These are based in part on prior analyses by the Urban Institute, PolicyLink, the Government Alliance on Race and Equity, and others.

**Procedural equity** is an approach to equity that ensures processes are fair for target participants. Many of the executive order's requirements (e.g., assessing whether and to what extent programs and policies perpetuate systemic barriers to opportunities and benefits for people of color and other underserved groups) fall under procedural equity. For example, every equity action plan lists some improvement to data collection as a key step for advancing racial equity. Though improving the quality and quantity of data broken down into categories such as race can help agencies understand inequities,

it is an administrative action that changes a process but does not necessarily include changes in decisionmaking or outcomes.

**Distributional equity** involves programmatic and resource decisions and changes that are likely to (re)allocate resources in ways that increase access to agency programs and services for people who have historically been excluded from them. For example, in section 7 of the executive order, changes to “procurement”—the bidding and awarding of funds via grants or contracts—can mean substantial changes in who receives funds, how easily, and how often. The executive order asked agencies to identify specific procurement changes that could advance equity. Several agencies, such as the Department of Transportation and the Department of the Interior, proposed new strategies for publicizing and acquiring services from a broader range of vendors. Similarly, the Department of Justice planned to improve access to grants for culturally specific, community-based organizations, and to increase funding opportunities for historically disadvantaged businesses.

**Structural equity** refers to more comprehensive equity commitments that involve changing an organization's structures or incentives to improve outcomes. Exemplars not only acknowledge the past structures that created or sustained historical harm (such as redlining in housing), but also propose new structures or designs to remedy past harms as a way to create equitable outcomes today. Although the executive order did not reference this organizational level of equity, several agencies proposed changes to their decisionmaking structures and how they frame their impact. For example, the Environmental Protection Agency is planning a comprehensive framework whereby it would consider cumulative burdens and impacts on health and quality of life when determining harms and benefits experienced by community members that result from its programs and activities.

Not all agencies share histories of harm or have the same capacity and knowledge with which to shape equity actions. Therefore, we would not expect all agencies to start with or prioritize the same approach at the same time. To break down the actions within each approach, we considered whether an equity commitment was an input (an activity), an output (an intermediate change), or an outcome (a desired change). We used this structure of a logic model to identify different types of equity actions on the path to impact. Though agencies may disagree with some of our categorizations, we hope the elements and path of a logic model provide a useful structure for shared reflection.

The clearest equity action plans read like logic models combined with root-cause analyses, showing how past policies created present conditions and charting a path from a proposed program or policy change to a projected improvement in outcomes (we recognize past and present implementation paths may not always be linear). Underlying this causal chain is the principle we described above of acknowledging policy history and the agency's or government's role in creating drivers of inequity. The plans with the most potential for impact focus on new actions and accountability measures that respond to those historical drivers of inequity. The closer action plans get to tackling root causes rather than symptoms of an equity problem, the more likely they are to create measurable change, which can be used to assess progress toward equity goals.

The executive order and the equity action plan process did not require agencies to set targets (e.g., for improved application or participation rates, for improved average outcomes, for new impact, etc.), nor did it require them to provide accompanying implementation plans. Therefore, it is difficult to identify a complete set of outputs and outcomes from all the equity commitments. But across all the activities, outputs, and outcomes described in the next section, we can start to see a progression from equity actions to equity strategies. This progression could inform agencies' updates to their action plans or new action plans per the February 2023 executive order.

## Findings of Our Review

In this section, we provide agency-specific examples of activities, outputs, and outcomes by each of the three equity approaches taken in the equity action plans. Examples range from practices to programs to policies. Some efforts involve designating new staff members, whereas others extend to new orientations and priority areas for an agency. For summaries of agency-specific plans, see Urban's forthcoming series of short digests of plans for agencies that fund or deliver social, educational, or infrastructure services. (Those digests will include links to the original equity action plans and refer to page numbers in the plans where specific actions appear.)

### Procedural Equity

#### ACTIVITIES

As noted earlier, one category of procedural activities included commitments related to data collection, analysis, and governance. These ran the gamut from tentative explorations of additional demographic variables to new comprehensive collections. The Departments of Labor and Education, the Equal Employment Opportunity Commission, the National Endowment for the Arts, and others planned new and improved data collection on the race and ethnicity of program participants and grant applicants. Labor's Employment and Training Administration will assess the adequacy and limitations of its demographic program data, identify challenges presented by incomplete data, and identify steps to improve the quality and scope of data collections to support data disaggregation by race and/or ethnicity. Many agencies' plans mention disaggregation as a general goal, whereas their annual evaluation plans may have more specific measurement-and-analysis plans.

Another category of activities involves community consultations. The Environmental Protection Agency expects to create capacity-building centers in communities nationwide, expand its outreach staff, and improve its internal capacity (i.e., its budget and culture) to better engage underserved communities to implement clear and accountable processes. The Department of Justice and the National Science Foundation proposed listening sessions and efforts to work with minority-owned businesses and college institutions serving Black, Hispanic, and tribal communities.

Other procedural activities involve application processes for key agency programs. For example, the Department of Agriculture will reduce administrative barriers to program access by simplifying farm loan applications and improving its translation services to ensure producers with limited English

proficiency can access the department’s services. The Department of Education will review and improve its college student financial aid verification model, including the criteria it uses to select applicants for additional financial aid verification. The Federal Communications Commission and the Small Business Administration will help program navigators (people who help applicants learn and complete processes) reach communities and help new applicants prepare and apply for loans and services. In some cases, agencies did not propose a series of specific steps but did acknowledge the populations that have historically been excluded; for instance, the Social Security Administration acknowledged limited access to benefits and services for people in rural areas, people in tribal lands, and people with limited internet access.

Recognizing the language barriers facing non-native English speakers, part of the 2021 executive order’s request to focus on civil rights activities and actions, many agencies proposed different levels and formats of expanded language assistance. The goal of translating more agency documents appeared in the plans of the Departments of Justice, Health and Human Services, and the Treasury and the Office of National Drug Control Policy, among other agencies. Some agencies proposed Spanish-language web portals, including the Equal Employment Opportunity Commission, whose portal is now live and has translations of all the documents on the English site. The Department of Labor proposed to hire bilingual staff. Health and Human Services is updating its language access plan and provided grants to organizations to develop and assess methods of providing people with limited English proficiency information on language access services.

## OUTPUTS

The activities above could improve measures of access, reach, and use—all of which are outputs or stages on the path to improving equity in outcomes. As part of piloting efforts to streamline the process of applying for and getting certified for benefits, the Department of Labor is creating new indicators of barriers to accessing unemployment insurance to measure those outputs. Health and Human Services is tracking its efforts to reduce maternal mortality with indicators like changes in the rates of postpartum coverage via Medicaid and the Children’s Health Insurance Program. The Department of Commerce, the Small Business Administration, and others that interact with businesses are tracking the number of entrepreneurs using their services. The Department of Housing and Urban Development said it would track the number of Fair Housing Act complaints received, processed, and closed as well as cases referred and processed.

## OUTCOMES

The new access and usage indicators in the agencies’ equity action plans capture the outputs of the agencies’ new supports. But they do not yet capture inequities or disproportionalities, such as what share of children who need support services do not receive them or how the share of successful applicants from a given community or demographic group compares to the share of eligible applicants in that community or group.

Moreover, the plans tend not to specify whether groups that were excluded from programs in the past will now receive additional or compensatory program services in ways that boost their outcomes.

For example, the Social Security Administration acknowledges in its plan that domestic workers were excluded from Social Security, and the Department of Agriculture acknowledges harm to Black and Native American farmers who were excluded from or had limited access to farm subsidies and other programs offered by the department. Yet the plans do not outline strategies for compensating them or improving their outcomes (for instance, improving rates of college completion, increasing business revenues, etc.).

Planning documents other than the equity action plans, such as annual evaluation plans and the agency priority goals, do state targets for improvement. For example, relating to the Social Security Administration's goal of improving the application process for claimants and addressing underserved groups, its agency priority goals state that by September 30, 2023, the administration will "increase the number of SSI [Supplemental Security Income] applications from underserved communities by 25 percent, relative to the 2021 baseline."<sup>6</sup> These more specific benchmarks for improvement offer an opportunity to measure agencies' progress. And integrating these types of targets and metrics into the equity action plans, or vice versa, can ensure a cohesive approach to executing action plans within an agency.

## **Distributional Equity**

### **ACTIVITIES**

Procurement is one of the largest government activities related to the distribution of opportunity and resources. Although few agencies proactively defined distributional equity in their equity action plans, many proposed ways to open up previously closed or complicated processes for accessing federal funds. Several committed to reconsidering how they write solicitations for grant or contract applications, reconsidering how they review applications, and increasing funding opportunities for disadvantaged businesses. The Department of the Interior acknowledged it needed more internal staff members to improve outreach and reviews of grants and contracts.

The Department of Education, the Social Security Administration, the National Science Foundation, and others mentioned working with higher-education institutions (historically Black colleges and universities, Hispanic-serving institutions, and tribal colleges and universities) to create new research grant competitions and to launch new centers for some service delivery and/or outreach because of those institutions' long-standing connections with underserved communities. Other grantmaking agencies, including the National Endowments for the Arts and Humanities and the Corporation for National and Community Service, described efforts to simplify application processes, increase awareness of contract and procurement opportunities, and more accurately monitor and track procurement opportunities for underrepresented people and business owners.

Other procurement activities involved partnerships to reach new potential funding applicants and recipients. For instance, the Department of the Treasury created the Procurement Equity Council, an internal team working to target new entrants, steward equity initiatives, and track implementation progress. The Department of Labor will develop new strategic partnerships with community-based



organizations, worker centers, unions and industries, and state and local governments. The Department of Housing and Urban Development plans to expand access to financing for affordable housing types like manufactured housing. In addition, it will work with nontraditional lenders and community-based institutions to reach new applicants for Office of Community Planning and Development grant programs, and it aims to increase residential mortgage lending on tribal trust lands, including by increasing lender outreach.

Another aspect of distributional equity is program eligibility and accessibility. The Social Security Administration proposed to issue a rule whereby musculoskeletal disorders qualify for the national Disability Insurance program, which could expand eligibility. The Department of Agriculture proposed a new grant program for state agencies that administer the Farmers' Market Nutrition Program (a program of the Special Supplemental Nutrition Program for Women, Infants, and Children), which is aimed at modernizing benefit delivery under the authorization and funding provided in the American Rescue Plan Act. (Curiously, the Department of Agriculture's equity action plan emphasizes the Special Supplemental Nutrition Program for Women, Infants, and Children to the exclusion of the Supplemental Nutrition Assistance Program, for which many more people are eligible and where changes to the program's employment and job search requirements could affect millions of people while expanding nutrition access.)

Recognizing the historical exclusion of and barriers for tribal communities, many agencies, including the Departments of Education, the Interior, and Health and Human Services, the Environmental Protection Agency, the Interagency Council on Homelessness, and the Social Security Administration, proposed to create different ways for those communities to access programs. The Department of Agriculture noted it will remove legacy preferences for nontribal providers to open up eligibility to a variety of its programs. The Department of Commerce proposed a tribal broadband connectivity program to expand internet access. It remains to be seen whether the application processes for these new or expanded funds are designed for quick and easy access.

## OUTPUTS

Key outputs of procurement activities include data on spending and awards, which show how fairly agencies are spending and awarding their resources and which can be analyzed to show what would be required to rectify previous imbalances (despite comparable skills or qualifications) in who applied for and received federal grants and contracts. (These data are distinct from demographic data, which are more of an input for analyzing disparities between demographic groups.)

The Departments of Labor, the Interior, and Transportation and the Environmental Protection Agency proposed procurement-data dashboards to track how well they diversify their supplier or vendor pools to include excluded or underrepresented demographic groups and small businesses. Before the equity action plan process, the Small Business Administration already had a scorecard for measuring equity in procurement and pledged in its plan to work with the Office of Federal Procurement Policy to develop measures of the application and contracting experience for small businesses. Transportation committed to tracking the number of grant applicants from historically disadvantaged communities and the number of new projects awarded in those communities. Education

said it is building a tracking system to assess the experiences and diversity of peer reviewers who serve on grant decision panels.

Some agencies pledged significant sums to improve reach and coverage. The Department of the Treasury made significant financial investments (approximately \$10 billion) in two programs to increase lending to small- and minority-owned businesses and help historically underserved communities respond to economic hardship during the COVID-19 pandemic. The Department of Agriculture announced approximately \$16.6 million in funding to community-based and nonprofit organizations, institutions of higher education, and tribal entities that help underserved and veteran farmers and ranchers own and operate successful farms. The Department of Justice committed to tracking the percentage of contracting dollars awarded to business owners in Historically Underutilized Business Zones, which are designated for small businesses in distressed and rural areas of the country.

## OUTCOMES

Ideally, the equity action plans draw clear connections between data-driven investments and outcomes. For example, the Department of Transportation, which had created a quantitative equity-screening component in its Transportation Improvement Program, committed in its plan to increasing the number of state-level transportation departments and Metropolitan Planning Organizations using that screening component to work with communities to select projects for funding.

To support data-driven decisions about where to reallocate resources, several agencies use data to identify communities based on disparities in outcomes. At Health and Human Services, the Centers for Disease Control and Prevention and the Office of Minority Health partnered to develop a new measure, the Minority Health Social Vulnerability Index, to identify racial and ethnic communities at the greatest risk of adverse outcomes due to the COVID-19 pandemic. Reductions in that index score should correspond to improved well-being and result from newly targeted investments.

## Structural Equity

### ACTIVITIES

Some agencies incorporated equity into high-stakes structures that incentivize large-scale action. Health and Human Services and the Small Business Administration went so far as to pledge to incorporate equity impact assessments when making legislative and program proposals to include in the president's annual proposed budget. The Consumer Financial Protection Bureau and Treasury integrated equity into their strategic biannual and quarterly organizational performance reviews, respectively, and Treasury also incorporated equity principles into budget formulation. The Environmental Protection Agency said it will integrate equity, environmental justice, and civil rights benchmarks into the annual performance plans and reviews for relevant agency staff (and that consultation with employee unions and leadership may inform this process). Education said it would work to incorporate its commitments into annual program reporting guidelines, its strategic plan, and its agency priority goals.

As an example of addressing a mechanism identified with inequities and disproportionate effects in communities of color, the Department of Justice said it will explore federal guidance for law enforcement agencies on limiting the use of chokeholds, restricting no-knock warrants, and increasing the use of body-worn cameras. The Environmental Protection Agency said it will track the percentage of its significant actions that respond to environmental-justice concerns and address disproportionate impacts.

## OUTPUTS

Some agencies pursued efforts to address equity via new staffing and outreach structures, so that equity is embedded into a variety of decisionmaking processes. These include shared decisionmaking with communities (Environmental Protection Agency), new agency leadership positions devoted to equity (Departments of Agriculture and Labor), and a new external equity commission (Department of Agriculture). They also include designating subagencies and offices to lead more equity-focused work; for example, Health and Human Services' Office of Minority Health is leading a health equity inventory of the agency's projects, staffing, and opportunities for collaboration with communities.

Others are conducting analyses in ways that can illuminate differential access or protection. For example, the Department of Labor proposes an enforcement analysis to understand comparative labor standards offered by relevant worker protection laws (not just between states but also between groups).

Several agencies proposed to examine bias in their decisionmaking processes. The Department of Housing and Urban Development's plan includes new actions to reduce structural bias in home appraisals, including training for all appraisers in anti-bias, fair housing, and fair lending practices. The Consumer Financial Protection Bureau also said it would work across agencies to eliminate bias in home appraisals. The National Endowment for the Humanities said it would convene an external advisory board to review explicit or implicit bias in its grantmaking. The Social Security Administration will require training on unconscious bias for all its employees, including those who make decisions on eligibility for Disability Insurance and Supplemental Security Income disability benefits, to help make the application and claiming processes easier and more equitable.

## OUTCOMES

Structural equity outcomes reflect how well agencies adopt new orientations and pursue cohesive approaches to achieve equity. For example, the Environmental Protection Agency proposed a new way of measuring equity in terms of cumulative impact, not just impact at a point in time. It is operationalizing this framework with "outcome-based metrics to demonstrate progress, including quantifiable pollution reduction benefits in communities that result from decisions that factor in cumulative impacts."<sup>7</sup> The Department of Transportation is introducing a new measure, focused on transportation cost burden, so it can see whether its investments as a whole create meaningful day-to-day change for transit riders or commuters. This work will be part of its new national equity accelerator initiative.

Some agencies took a new orientation that went beyond new outcome measures. They reframed challenges by drawing connections between multiple agencies and/or identifying how their funding

streams interact with other funding and could affect many types of outcomes. For example, the Department of Health and Human Services established the Office of Climate Change and Health Equity as a hub for its policy, programming, and analysis related to climate change and health policy, and it will now track environmental justice and health equity. The Department of Agriculture also will focus on environmental justice, and it will require policies and activities that benefit underserved rural communities. Instead of seeing this new focus as outside the scope of the federal equity reforms, a structural analysis recognizes how government systems (across agencies, and across federal and state levels) are layered upon and interact with each other to exclude certain communities.

## Summary

Just as agencies bring different levels of capacity on any topic or set of commitments, the types of equity commitments in agencies' equity action plans and other documents, and the specificity of those commitments, differ. We identified some general areas agencies can focus on as they fulfill those commitments as well as specific steps they can take:

- **Data collection:** Collect more detailed demographic data, particularly on race and ethnicity. Go beyond individual characteristics and include new system-level outcomes.
- **Equity measurement:** Develop new indicators of equity. Go beyond reporting on disparities in inputs or outputs between racial groups and report on equity impact.
- **Outreach:** Conduct outreach to new or historically underserved communities, ideally with more cultural competence and language access.
- **Procurement:** More intentionally prepare, release, review, and award grants and contracts, and link these with targeted outreach.
- **Program improvement:** Make programs more accessible by simplifying them or providing navigation assistance, and evaluate whether these changes improve equity-related outcomes.
- **Staffing:** Advance internal/organizational hiring and professional development practices, ideally to reduce bias in decisionmaking.

Many agencies' plans included at least two clear activities from this list; plans that were more cohesive and integrated agencies' various ideas included all of the items.

Notably, these plans came together in a short period, especially considering agencies were appropriated no new funding for them. The release of 90+ plans demonstrates the power of collective goal-setting—each agency, regardless of how much it had conceptualized, planned, and taken actions around equity, had to set at least a baseline for equity practices. Even though these were not meant to be documents of leading-edge innovation, they propose interesting ideas for reducing paperwork and other burdens. And some agencies' plans, including those of the Departments of Agriculture and Housing and Urban Development, show it is possible for federal agencies to reflect on ways to remedy their histories of exclusion.

# Recommendations

Our review highlights many opportunities for agencies to follow through on their equity commitments and shows that plans for equity action could now become plans for equity accountability. We divide our recommendations into those an executive order could incorporate, those the Office of Management and Budget or other cross-agency entities can lead, and those that agencies can implement. Our hope is that these recommendations offer examples of equity outcomes (not just equity activities) and can inform how agencies advance procedural, distributional, and structural equity.

## For an Executive Order

There are many possible directions that future executive orders could emphasize to support follow-through on the concepts and commitments in the equity action plans. We suggest a few as thought exercises for how to advance equity.

One option is to help agencies set a clear “North Star” equity goal and/or organize agencies around a priority list of goals. For example, it could be helpful to explain what equity means to constituents and agency staff in clear terms, such as “closing the racial homeownership gap” or “reducing long-term child poverty in rural and urban areas.” No one agency can achieve such goals alone, so agencies might feel reluctant to use their own plans to take them on. But if agencies received support in working on government-wide equity goals, there could be more clarity of purpose.

Another option is to think about how coordinating different planning efforts could avoid redundant processes in different parts of an agency. For example, as offices within agencies develop and release agency strategic plans, annual evaluation plans, and equity action plans, how might they build on each other’s learning and organization efforts?

A third option is to think about how budget requests could both reflect equity and advance it. For example, could budget requests be framed in terms of the resources needed to close the gap identified in a North Star goal? In terms of the number of historically excluded people who would be supported by the investment? In terms of the time saved by reducing administrative burdens that have fallen disproportionately on historically underserved communities?

## For the Office of Management and Budget or Interagency Working Groups

The Office of Management and Budget can invest in building agencies’ equity capacity and expertise and strengthening the capacity agencies already have. For example, it can help agencies transform and enhance the additional data collection they have proposed into new actions to reach nonparticipants and/or track services delivered and outcomes participants have attained. It can also sharpen agencies’ focus on measuring progress, which might involve some agency-specific choices of whether they are measuring difference (disparity), unfairness (inequity), and/or disproportionality (over- or underrepresentation relative to the US population). Different agencies might need to choose different measures: the Department of Education could focus on how disproportionate gaps in K-12 graduation

are related to disproportionate use of exclusionary discipline for children of color, whereas Housing and Urban Development could focus on expanding access to Federal Housing Authority loans, which have been proven to help Black households access homeownership.

The office could also help agencies identify structures, not just processes, that need to change. Some agencies describe barriers to equity as administrative or resource challenges rather than as the results of structural or systemic policies and practices. Encouraging agencies to step back and think of changes related to structural equity could support larger, less incremental, reforms.

Another option is to identify shared goals where cross-program coordination or leadership could resolve fragmentation and unintended consequences. For example, how are the Departments of Education and Housing and Urban Development, the Federal Housing Administration, the Interagency Council on Homelessness, and Veterans Affairs working to ensure homeless students receive services faster? How could the different programs that support child care providers consider how inequities in one program can be offset or compounded by other programs? With so many new tribal outreach groups and tribal working groups and with so much proposed outreach to historically Black colleges and universities, how can agencies ensure the people those efforts target are not overburdened?

Lastly, the office could consider how agencies can learn from each other based on common scope. For example, which agencies have missions and scopes that naturally center equity (like Housing and Urban Development); which agencies have opportunities in their missions to address equity (like the Department of Agriculture); and which might not see immediate opportunities but have many contact points with or purview over constituencies (like the Federal Communications Commission)?

## For Agencies

As agencies work toward their equity goals, they could benefit from outlining clearer causal connections between activities and outcomes. Even if they do not yet have clarity on how activities will move national-level outcomes, they could provide more clarity on the activities and outputs themselves. Though all the agencies we reviewed referred to at least one group that has been excluded from or has lacked access to services and programs, only a few identify actions that target a specific group.

Agencies that outlined how an activity would lead to an output or outcome can track their progress at different agency levels, creating an opportunity for both internal and external accountability. For example, Housing and Urban Development listed more than a dozen activities to eliminate the racial homeownership gap; although there was a clear outcome and measure in this case, the agency could discuss how the activities will lead to the outcome. The Department of Agriculture acknowledged its “long history of inequity and discrimination against farmers from underserved groups”<sup>8</sup> and highlighted target populations but without specifying a clear outcome measure.

The equity action plans offer a strong foundation for action in the coming year, and the new requirement that agencies issue these plans annually could be an opportunity to track how agencies are following through on commitments with innovative and scalable action.

## Notes

- <sup>1</sup> Exec. Order No. 14091, 88 FR 10825 (2023).
- <sup>2</sup> Exec. Order No. 13985, 86 FR 7009 (2021).
- <sup>3</sup> Office of Management and Budget, *Study to Identify Methods to Assess Equity: Report to the President* (Washington, DC, 2021), 3.
- <sup>4</sup> Exec. Order No. 13985, 86 FR 7009 (2021).
- <sup>5</sup> That rubric is available as an appendix to this brief at <https://www.urban.org/research/publication/pathways-equity>.
- <sup>6</sup> “Improve Equity in the Supplemental Security Income Program” (Social Security Administration two-year goal), performance.gov, accessed March 6, 2023, <https://www.performance.gov/agencies/SSA/apg/goal-3/>.
- <sup>7</sup> US Environmental Protection Agency, *E.O. 13985 Equity Action Plan: U.S. Environmental Protection Agency* (Washington, DC: 2022), 7.
- <sup>8</sup> US Department of Agriculture, *Equity Action Plan: U.S. Department of Agriculture (USDA)* (Washington, DC: 2022), 1.

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