

Equity Action Plan Digest: Department of Labor

Summarized by Madeline Baxter

This is one in a series of Urban Institute digests summarizing federal agencies', subagencies', and commissions' 2022 equity action plans, which were released in response to the Biden administration's January 2021 executive order, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. The Department of Labor's equity action plan is available at <https://www.dol.gov/sites/dolgov/files/general/equity/DOL-Equity-Action-Plan.pdf> (PDF).

Overview

What problem is the agency trying to solve?	Improving working conditions and economic opportunities for all workers to improve well-being of underserved, marginalized, and excluded communities (p. 1)
Priority groups	At-risk youth (pp. 15–17), Black people (pp. 6–15), Hispanic people (p. 6), immigrant workers (pp. 2–17), LGBTQ+ people (p. 2), Native Americans (p. 18), noncitizen workers (p. 6), people with disabilities (pp. 2–17), women (pp. 2–17), veterans (pp. 2, 4)
Historic harm mentioned?	Yes
Partners in implementation	American Association for Access, Equity, and Diversity (p. 4); historically Black colleges and universities (p. 4); Occupational Safety and Health Administration (pp. 4, 13–14); Office of Disability Employment Policy (p. 4); state and local governments (p. 6); Veterans' Employment and Training Service (p. 4); Wage and Hour Division (p. 4–8); workers' centers, unions, and industry associations (p. 8)
Equity defined as	"The U.S. Department of Labor (DOL) is committed to improving the well-being of underserved, marginalized, and excluded communities, recognizing that by doing so we improve working conditions and economic opportunities for all workers" (p. 1)

Pillars and Principles of Equity

Acknowledgement of past harm and present barriers	Underserved workers in sectors prone to wage and hour violations (p. 6); lack of structures for communicating workplace rights (p. 6) and benefit eligibility (p. 9); limited enforcement resources (p. 6); lack of disaggregated data on program access (p. 9); decentralized translation services (p. 13); discretionary grant policies may limit access (p. 15)
Impact goals	Develop partnerships with community-based organizations (p. 4); enforce wage and hour laws (pp. 6–8); strategic partnerships that provide training and resources (p. 8); state grants to promote equitable unemployment-insurance access (p. 10); creation of the Unemployment Insurance Equity Research to Action Center (p. 11); build learning community for navigator grantees (p. 11); engage underserved populations (pp. 15–17); build new paths to government apprenticeships (pp. 16–20)
Actions and activities	Regional and local Wage and Hour Division workplace retaliation trainings, internal staff-learning opportunities, enforcement analysis of comparative labor standards (p. 7); Mine Safety and Health Administration hiring bilingual staff, funding for translation services and centralized language access team, gathering surveys of department staff to understand language needs (p. 14); changing data collection to include equity-oriented data (p. 16); conducting equity analyses of current grantees (p. 17)
Accountability measures and approaches	Inventory of equity-oriented data (p. 3); two-year timelines for each intervention (p. 4); benchmarking against comparative labor standards, tracking Wage and Hour Division field staff workplace retaliation training completion (p. 7); developing indicators of unemployment insurance program access and barriers (p. 11); align agency management plans within Occupational Safety and Health Administration and Mine Safety and Health

Administration (p. 14); key performance indicators on language access developed in agency management plan (p. 14); the Employment and Training Administration and Veterans' Employment and Training Service will conduct a retrospective review of FY 2022 grants and program designs (p. 17); expanding data collected in, and the scope of, apprenticeship partners' information management data system (p. 20)

Note: For the rubric we used to evaluate these components of the equity action plans, see the appendix to the Urban Institute's 2023 brief "Pathways to Equity at Scale: An Analysis of the 2022 Federal Equity Action Plans and Recommendations for 2023 Plans," available at https://www.urban.org/sites/default/files/2023-03/Pathways%20to%20Equity%20at%20Scale%20Appendix_0.pdf.

Types of Equity and Related Activities

Procedural (example: expanding language and translation services; simplifying the vendor application process)	Established principles for removing procurement barriers (p. 3); reducing unemployment insurance backlogs and providing education to improve program access (p. 9); tracking grantees' equity performance (p. 10); producing disaggregated federal indicators of access to unemployment insurance benefits by demographic group (p. 12); developing government apprenticeships to create paths to federal roles for job applicants (p. 19)
Distributional (example: creating new procurement program)	Providing \$15 million to states to create navigator programs (pp. 10–11); establishment of Unemployment Insurance Equity Research to Action Center (p. 11); establishment of learning communities between navigator grantees (p. 11); changing data collection to include equity-oriented data (p. 16); Employment and Training Administration will analyze participant outcomes and access to services segmented by salient demographic variables for key programs (p. 16)
Structural (example: policy change via proposing legislation related to an equity goal; changing organizational functions)	Mine Safety and Health Administration to improve hiring of bilingual staff (p. 14); creating centralized language access team (p. 14); expanding data collected within Registered Apprenticeship Partners Information Data System (p. 20)

Key Metrics to Measure Progress on Equity

- equity grantee performance tracked as part of the strategic plan (p. 10)
- new indicators of access and barriers to unemployment insurance (p. 10)
- tracking and analyzing unemployment insurance claimant feedback (p. 11)
- Mine Safety and Health Administration sign translation (p. 14)
- Employment and Training Administration program participant outcomes (p. 16)

Looking Ahead: Key Reflections for Plan Implementation

Where is the agency set up for success?	Equity action plan has been incorporated in DOL's strategic plan (p.10); action plan takes advantage of federal, national, and community-based networks (pp. 3–20); developed explicit measures of success and timeline (pp. 3–20); includes quantitative and qualitative data (pp. 3–20); the action plan provides extensive specifics; the updated agency priority goals develop a central timeline, define responsibilities, identify community-based organizations for collaboration, and develop internal staff resources
Areas for future investment and growth	Tailor interventions to different underserved groups; explicitly discuss internal culture, process, and policy; clearly define how DOL will reach new stakeholder communities; engage program beneficiaries in development of agency priorities; provide stronger details on historic harm; name how structural racism persists; centralize implementation responsibilities; invest internal resources in staff; develop centralized ability to track and evaluate equity outcomes